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PRC

PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

ZEHRCO PLASTICS, INC. (FORMERLY ROCKWELL INTERNATIONAL - PLASTICS DIVISION) ASHTABULA, OHIO OHD 064 098 262

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	R05032
EPA Region	:	5
Site No.	:	OHD 064 098 262
Date Prepared	:	March 11, 1993
Contract No.	:	68-W9-0006
PRC No.	:	309-R05032OH35
Prepared by	:	PRC Environmental Management, Inc. (Mary Joyce Freibert)
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

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FINAL REPORT

COMBINED NEW & OLD SITE NAMES

Note: Old name in cerclis

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2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; a history of documented releases; regulatory history; environmental setting; and receptors.

2.1 FACILITY LOCATION

RIPD's Part A permit application included two parcels of land. One parcel of land is located and occupies about 6 acres at 1501 West 47th Street in Ashtabula, Ashtabula County, Ohio. The other parcel of land is located and occupies about 48.9 acres at 1741 West 47th Street. Figure 1 shows the location of the facilities in relation to the surrounding topographic features (latitude 41°51'54" N and longitude 80°48'25" W). Both parcels of land are located in an industrial and residential area.

The one parcel of land located at 1501 West 47th Street is bordered on the north by Reliance Electric Company and vacant land; on the west by ITEN, Inc.; on the south by a residential area and Molding Fiberglass Company (MFC); and on the east by West Avenue Junior High School. The other parcel of land located at 1741 West 47th Street is bordered on the north by Ashland Oil Co. (Ashland); on the west and south by vacant land; and on the east by ITEN, Inc.

2.2 FACILITY OPERATIONS

In 1954, MFC purchased two parcels of land with about 55 acres of undeveloped land to build a manufacturing facility. MFC manufactured custom fiberglass-reinforced plastic parts. Between 1954 and the mid 1970s, Plants No. 1, 2, and 3 were built on the undeveloped land. In the early 1970s, RIPD purchased the 55 acres with Plants No. 1, 2, and 3 from MFC. In 1981, the RIPD facility discontinued manufacturing plastic parts. Between 1984 and 1986, RIPD sold Plant No. 1 to Robert S. Morrison (Morrison), Plant No. 2 to Zehrco, Plant No. 3 to Ronald Kister (Kister) of Kister Construction Co., and a small triangle parcel of land with railroad tracks to Ashland. Ashland manufacturing operations are located on property north of the Morrison and Kister facilities.

The RIPD facility included Plants No. 1, 2, and 3. Plants No. 1 and 3 are located at 1741 West 47th Street, and Plant No. 2 is located at 1501 West 47th Street. In 1984, Morrison purchased Plant No. 1 from RIPD. The Morrison facility currently leases Plant No. 1 to the following companies: Creative Millwork (CM); Blanchard Abrasive (BA); Delta Chemicals (Delta);

VISUAL SITE INSPECTION SUMMARY (Continued)

Zehrco Plastics, Inc.
(formerly Rockwell International-Plastics Division)
1501 West 47th Street
Ashtabula, Ohio 44004
OHD 064 098 262

Date:	November 17, 1992
Primary Facility Representative: Representative Telephone No.: Additional Facility Representatives:	Joe Estock, Creative Millwork, Manager (216) 992-3566 Jack Felde, Delta Chemicals, Manager (216) 992-7039 Ron Marchewaka, Lawless Container, Manager (216) 428-5116 Ronald Kister, Kister Construction Company (Owner of Plant No. 3) (216) 992-4545
Inspection Team:	Lorraine Morris, PRC Sandy Anagnostopoulos, PRC
Photographer:	Lorraine Morris, PRC
Weather Conditions:	Cool, 60 °F
Summary of Activities:	PRC inspected the following companies that rent from Mr. Morrison: Creative Millwork, Delta Chemicals, and Lawless Container; and Total Warehouse and Distribution that rents from Mr. Kister. The visual site inspection (VSI) began at 2:20 p.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the facility's past and current operations, solid wastes generated at the facility, and the facility's release history. Facility representatives provided the inspection team with copies of requested documents. The VSI tour began at 2:45 p.m. PRC inspected a Sawdust Baghouse Dust Collector (SWMU 7), current and former container storage areas (CSA) (SWMUs 1 and 11), Former Waste Pile Storage Area (SWMU 2), Diatomaceous Earth Satellite Accumulation Area (SAA) (SWMU 12), former aboveground storage tanks (AST) (SWMU 13 and AOCs 1 and 2), the Underground Waste Oil Trap (SWMU 14), and the Solvent USTs (AOC 3). The tour concluded at 4:15 p.m., after which the inspection team held an exit meeting with facility representatives. The VSI was completed and the inspection team left the facility at 4:30 p.m.

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EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from the solid waste management units (SWMU) and other areas of concern (AOC) at the Zehrco Plastics, Inc. (Zehrco), facility in Ashtabula, Ashtabula County, Ohio. The facility was formerly operated by Rockwell International - Plastics Division (RIPD). This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from the SWMUs and AOCs identified.

In 1954, Molding Fiberglass Company (MFC) purchased about 55 acres of undeveloped land to build a manufacturing facility. MFC manufactured custom fiberglass-reinforced plastic parts. Between 1954 and the mid 1970s, Plants No. 1, 2, and 3 were built on the undeveloped land. In the early 1970s, RIPD purchased the 55 acres with Plants No. 1, 2, and 3 from MFC. In 1981, the RIPD facility discontinued manufacturing plastic parts. Between 1984 and 1986, RIPD sold Plant No. 1 to Robert S. Morrison (Morrison), Plant No. 2 to Zehrco, Plant No. 3 to Ronald Kister (Kister) of Kister Construction Co., and a small triangle parcel of land with railroad tracks to Ashland Oil Co. (Ashland). The facilities are currently located in an industrial and residential area.

The RIPD facility included Plants No. 1, 2, and 3. Plants No. 1 and 3 are located at 1741 West 47th Street, and Plant No. 2 is located at 1501 West 47th Street. In 1984, Morrison purchased Plant No. 1 from RIPD. The Morrison facility currently leases Plant No. 1 to the following companies: Creative Millwork (CM); Blanchard Abrasive (BA); Delta Chemicals (Delta); and Lawless Container (LC). In April 1984, Zehrco purchased Plant No. 2 from RIPD and began manufacturing operations in 1987. In December 1986, Kister purchased Plant No. 3 from RIPD. The Kister facility currently leases Plant No. 3 to a company known as Total Warehouse and Distribution (TW&D). In 1986, Ashland purchased the small triangle parcel of land from RIPD.

The Zehrco facility currently generates hazardous waste and is regulated under EPA Identification No. OHD 064 098 262, which was originally assigned to the three plants listed on RIPD's Part A permit application and Notification of Hazardous Waste Activity Form. The companies that occupy the Kister and Morrison facilities, and the small triangle parcel of land with railroad tracks to Ashland were also included under this EPA Identification Number, but currently do not generate hazardous waste.

The Zehrco facility manufactures and assembles custom fiberglass-reinforced plastic molding products for various industries, including the electrical, electronics, mass transit,

appliance, medical, construction, business machines, office equipment, and agriculture industries. CM manufactures wooden brackets for wooden windows and door grills. BA manufactures grinding wheels for grinding machinery. Delta manufactures aluminum sulfate for use in water treatment. LC is a warehouse for corrugated boxes. TW&D is a warehouse for various construction equipment. Ashland uses the small triangle parcel of land to transport various product material for its operations via the railroad tracks. Ashland manufacturing operations are located on property north of the Morrison and Kister facilities.

Hazardous waste streams formerly generated by the MFC facility are not known. The MFC facility operated press machines that formerly generated nonhazardous waste oil while manufacturing fiberglass-reinforced plastic molding products. The RIPD facility formerly generated spent paints (F002 and F005) and paint residues (F017). PRC was unable to determine what nonhazardous waste streams were generated by RIPD from state, federal, and facility files. Manufacturing operations were similar to the present Zehrco facility operations. The Zehrco facility generates and manages spent solvents (F002) and nonhazardous waste oil. CM generates and manages nonhazardous sawdust. BA generates and manages nonhazardous waste cleaning solution; spent resin; and a mixture of aluminum oxide, grit, and clay dust. Delta generates and manages nonhazardous waste diatomaceous earth. LC and TW&D do not generate hazardous or nonhazardous waste, other than municipal trash. Ashland does not generate hazardous or nonhazardous waste on the small triangle parcel of land.

The Zehrco facility currently occupies about 6 acres with Plant No. 2 occupying 160,000 square feet (ft^2) and employs about 45 people working three 8-hour shifts. The Zehrco facility access is controlled by an alarm system, security guards during the weekend, and a 6-foot chain-link fence surrounding three sides of the property. A gravel parking lot is located on the south side of the facility and is not fenced. The Morrison facility occupies about 6.7 acres. Plant No. 1 occupies about 310,000 ft^2, of which CM occupies 120,000 ft^2; BA occupies 135,000 ft^2; Delta occupies 25,000 ft^2; and LC occupies 30,000 ft^2. CM employs about 44 people working two 8-hour shifts; BA employs about 14 people working two 12-hour shifts; Delta employs about 5 people working one 8-hour shift; and LC employs one person working about 20 hours per week. The Kister facility occupies about 42 acres, of which Plant No. 3 with TW&D occupies about 270,000 ft^2. The Morrison and Kister facilities access are controlled by a 6-foot chain-link fence surrounding three sides of the property. A gravel parking lot is located on the south side of the facilities and is not fenced. Ashland occupies about 0.2 acres for transporting product material via the railroad tracks on the property. The area is fenced on the north.

RIPD submitted a RCRA Notification of Hazardous Waste Activity Form to EPA on July 21, 1980. The notification stated that the facility was operating as a large-quantity

generator of hazardous waste and listed the waste codes F002 and F005. On August 15, 1980, RIPD submitted a revised Notification of Hazardous Waste Activity Form to EPA. The revised notification added the waste code F017. RIPD submitted a RCRA Part A permit application on November 17, 1980. The RCRA Part A permit application stated that the facility was operating as treatment, storage, or disposal (TSD) facility. The RCRA Part A permit application specified the following capacities and process codes: 27,500 gallons of container storage (S01) capacity; and 30 cubic yards of waste pile storage (S03) capacity. The container storage (S01) is the Former Container Storage Area (CSA) (SWMU 1) and the waste pile storage (S03) is the Former Waste Pile Storage Area (SWMU 2).

In December 1983, RIPD submitted a closure plan for the Former CSA (SWMU 1). The closure plan did not include the Former Waste Pile Storage Area (SWMU 2). In 1984, EPA approved the closure plan. After PRC conducted a review of federal, state, and facilities files, no documentation was found that indicated the Former CSA (SWMU 1) and Former Waste Pile Storage Area (SWMU 2) were certified closed.

The Zehrco facility submitted a revised Notification of Hazardous Waste Activity Form to EPA on March 15, 1989. The notification indicated a change of address from 1741 West 47th Street to 1501 West 47th Street.

The PA/VSI identified the following 14 SWMUs and three AOCs at the facility:

Solid Waste Management Units

1. Former CSA
2. Former Waste Pile Storage Area
3. CSA No. 1
4. CSA No. 2
5. Spent Solvents Satellite Accumulation Areas (SAA)
6. Waste Oil CSA
7. Sawdust Baghouse Dust Collector
8. Grinder Baghouse Dust Collector
9. Ovens and Dumpster
10. Dilution Tank
11. CSA No. 3
12. Diatomaceous Earth SAA
13. Waste Oil Aboveground Storage Tanks (AST)
14. Underground Waste Oil Trap

Areas of Concern

1. Styrene ASTs
2. 2,500-Gallon Paint ASTs
3. Solvent Underground Storage Tanks (UST)

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SWMUs 1 and 2 are located outdoors and pose a low potential for release to all environmental media because they are inactive. A closure plan for the Former CSA (SWMU 1) was approved by EPA in 1984. However, SWMU 1 was never certified closed. A closure plan was never submitted for the Former Waste Pile Storage Area (SWMU 2). Wastes were removed from SWMUs 1 and 2, however, PRC found no documentation during a review of federal, state, and facility files, that RCRA closure activities for these units have been completed.

SWMU 14 and AOCs 1, 2, and 3 are located outdoors and pose a low to moderate potential for release to ground water or on-site soils. SWMU 14 poses a low to moderate potential for release to ground water and on-site soils because it is not known if pipes from Plant No. 1 leading to the unit are sealed. The unit has no secondary containment and has not had an integrity assessment conducted. It is not known if AOC 1 is empty or if it contains hazardous constituents. AOC 2 is lying on its sides and it is not known if the ASTs are empty or if they contain hazardous constituents. AOC 1 and 2 pose a low potential for release to ground water, surface water, and air. AOC 3 poses a moderate to high potential for release to ground water and on-site soils because it is not known if the water in the USTs contain hazardous constituents or if the USTs are leaking. Also, AOC 3 is about 20 years old and the integrity of the USTs are unknown. SWMU 14 and AOC 3 pose a low potential for release to surface water and air. AOC 1 and 2 pose a low to moderate potential for release to on-site soils.

SWMUs 3, 4, and 5 pose a low potential for release to all environmental media because they are indoors on a concrete floor with no visible cracks and they appear to be properly maintained. SWMUs 6, 8, 9, 10, 11, and 12 pose a low threat to all environmental media because they are indoors on a concrete floor with no visible cracks and they manage nonhazardous waste. SWMUs 7 and 13 pose a low potential for release to all environmental media because they are on concrete pads and they manage nonhazardous waste. SWMU 13 also has a 6-inch concrete berm surrounding it and it appears to be properly maintained.

One sensitive environment, a small wetland area less than 1 acre in size is located about 0.25 mile northwest of the facility. No other sensitive environments lie within a 2-mile radius of the facility. The nearest surface water body, the Ashtabula River, is located 1.25 miles east of the facility and is used for recreational purposes. Ashtabula County water supplies come from Lake Erie. There are no drinking water wells located within a 3-mile radius of the facility. The facilities have no on-site industrial ground-water wells. The facilities have had no history of documented releases to ground water, surface water, air, or on-site soils.

A closure plan for the Former CSA (SWMU 1) was approved by EPA in 1984. However, SWMU 1 was never certified closed. A closure plan was never submitted for the Former Waste

Pile Storage Area (SWMU 2). For SWMUs 1 and 2, PRC recommends that the facility submit the proper documentation for closure certification, or initiate RCRA closure activities as necessary.

PRC recommends further investigation of the Underground Waste Oil Trap (SWMU 14) to determine if the pipes leading to the unit are sealed and the source of an oily sheen noted on the surface of the water found in the unit. AOC 1 consists of two 750-gallon ASTs that contained product solvent. PRC recommends that the facility should determine if the one AST (AOC 1) is empty and that the other AST (AOC 1) does not contain hazardous constituents. PRC also recommends that the facility should determine if the 2,500-Gallon Paint ASTs (AOC 2) are empty or if the ASTs contain hazardous constituents. PRC recommends that the liquid in the Solvent USTs (AOC 3) and soil in the area should be sampled and analyzed for hazardous constituents. PRC also recommends that the facility remove and properly dispose of the Solvent USTs (AOC 3).

No further actions are recommended for CSA No. 1 (SWMU 3), CSA No. 2 (SWMU 4), the Spent Solvents SAAs (SWMU 5), the Waste Oil CSA (SWMU 6), the Sawdust Baghouse Dust Collector (SWMU 7), the Grinder Baghouse Dust Collector (SWMU 8), the Ovens and Dumpster (SWMU 9), the Dilution Tank (SWMU 10), CSA No. 3 (SWMU 11), the Diatomaceous Earth SAA (SWMU 12), or the Waste Oil ASTs (SWMU 13).

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. R05032 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Zehrco Plastics, Inc. (Zehrco), facility (EPA Identification No. OHD 064 098 262) in Ashtabula, Ashtabula County, Ohio. The facility was formerly operated by Rockwell International - Plastics Division (RIPD). The PA was completed on October 1, 1992. PRC gathered and reviewed information obtained from Ohio Environmental Protection Agency (OEPA) and EPA Region 5 RCRA files. Additional sources of information were obtained from the Federal Emergency Management Agency (FEMA), the National Oceanic and Atmospheric Administration (NOAA), the U.S. Department of Commerce (DOC), the United States Department of Agriculture (USDA), and the United States Geological Survey (USGS). The VSI was conducted on October 28, 1992. A follow-up VSI was conducted

on November 16 and 17, 1992. It included interviews with facility representatives and a walk-through inspection of the facility. PRC identified 14 SWMUs and three AOCs at the facility.

The VSI is summarized and 20 inspection photographs are included in Attachment A. Field notes from the VSI are included in Attachment B.

2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; a history of documented releases; regulatory history; environmental setting; and receptors.

2.1 FACILITY LOCATION

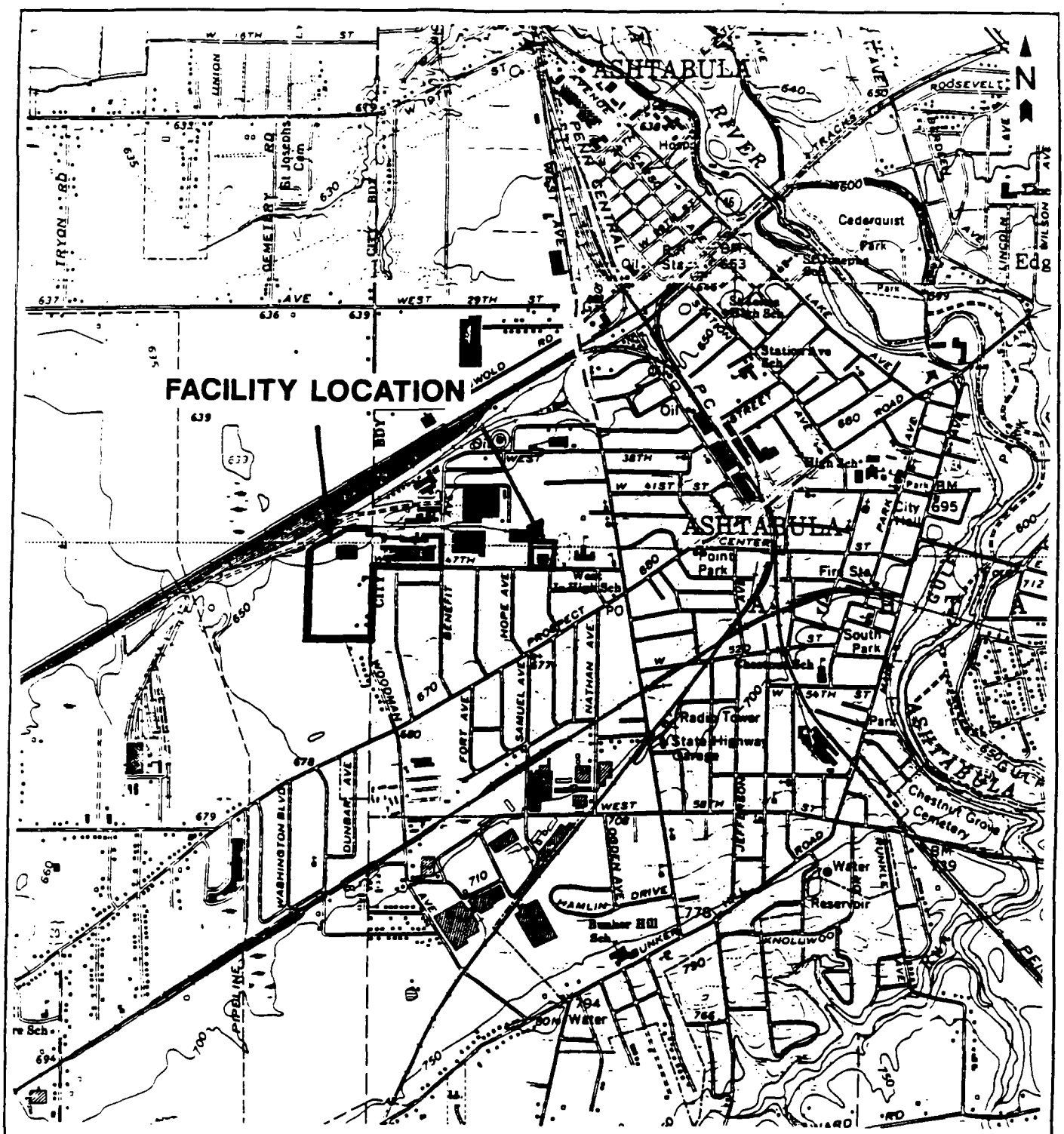
RIPD's Part A permit application included two parcels of land. One parcel of land is located and occupies about 6 acres at 1501 West 47th Street in Ashtabula, Ashtabula County, Ohio. The other parcel of land is located and occupies about 48.9 acres at 1741 West 47th Street. Figure 1 shows the location of the facilities in relation to the surrounding topographic features (latitude 41°51'54" N and longitude 80°48'25" W). Both parcels of land are located in an industrial and residential area.

The one parcel of land located at 1501 West 47th Street is bordered on the north by Reliance Electric Company and vacant land; on the west by ITEN, Inc.; on the south by a residential area and Molding Fiberglass Company (MFC); and on the east by West Avenue Junior High School. The other parcel of land located at 1741 West 47th Street is bordered on the north by Ashland Oil Co. (Ashland); on the west and south by vacant land; and on the east by ITEN, Inc.

2.2 FACILITY OPERATIONS

In 1954, MFC purchased two parcels of land with about 55 acres of undeveloped land to build a manufacturing facility. MFC manufactured custom fiberglass-reinforced plastic parts. Between 1954 and the mid 1970s, Plants No. 1, 2, and 3 were built on the undeveloped land. In the early 1970s, RIPD purchased the 55 acres with Plants No. 1, 2, and 3 from MFC. In 1981, the RIPD facility discontinued manufacturing plastic parts. Between 1984 and 1986, RIPD sold Plant No. 1 to Robert S. Morrison (Morrison), Plant No. 2 to Zehrco, Plant No. 3 to Ronald Kister (Kister) of Kister Construction Co., and a small triangle parcel of land with railroad tracks to Ashland. Ashland manufacturing operations are located on property north of the Morrison and Kister facilities.

The RIPD facility included Plants No. 1, 2, and 3. Plants No. 1 and 3 are located at 1741 West 47th Street, and Plant No. 2 is located at 1501 West 47th Street. In 1984, Morrison purchased Plant No. 1 from RIPD. The Morrison facility currently leases Plant No. 1 to the following companies: Creative Millwork (CM); Blanchard Abrasive (BA); Delta Chemicals (Delta);



SOURCE: MODIFIED FROM USGS, ASHTABULA NORTH (1988) AND ASHTABULA SOUTH (1970) QUADRANGLES

ZEHRCO PLASTICS, INC.
FORMERLY ROCKWELL INTERNATIONAL–
PLASTICS DIVISION
ASHTABULA, OHIO

FIGURE 1
FACILITY LOCATION

PRC ENVIRONMENTAL MANAGEMENT, INC.

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and Lawless Container (LC). In April 1984, Zehrco purchased Plant No. 2 from RIPD and began manufacturing operations in 1987. In December 1986, Kister purchased Plant No. 3 from RIPD. The Kister facility currently leases Plant No. 3 to a company known as Total Warehouse and Distribution (TW&D). In 1986, Ashland purchased the small triangle parcel of land from RIPD.

The Zehrco facility currently generates hazardous waste and is regulated under EPA Identification No. OHD 064 098 262, which was originally assigned to the three plants listed on RIPD's Part A permit application and Notification of Hazardous Waste Activity Form. The companies that occupy the Kister and Morrison facilities, and the small triangle parcel of land with railroad tracks to Ashland were also included under this EPA Identification Number, but currently do not generate hazardous waste.

The Zehrco facility manufactures and assembles custom fiberglass-reinforced plastic molding products for various industries, including electrical, electronics, mass transit, appliance, medical, construction, business machines, office equipment, and agriculture industries. CM manufactures wooden brackets for wooden windows and door grills. BA manufactures grinding wheels for grinding machinery. Delta manufactures aluminum sulfate for use in water treatment. LC is a warehouse for corrugated boxes. The TW&D facility is a warehouse for various construction equipment. Ashland uses the small triangle parcel of land to transport various product material for its operations via the railroad tracks.

The Zehrco facility processes that generate solid waste include paint booth operations and equipment maintenance. The Zehrco facility currently has three less than 90-day container storage areas (CSA) that are CSA No. 1 (SWMU 3), CSA No. 2 (SWMU 4), and Waste Oil CSA (SWMU 6) and two Spent Solvents Satellite Accumulation Areas (SAA) (SWMU 5). TW&D does not generate solid waste; however, Former CSA (SWMU 1) and Former Waste Pile Storage Area (SWMU 2) are located west of the TW&D building, and 2,500-Gallon Paint Aboveground Storage Tanks (AST) (AOC 2) is located north of the TW&D building. CM generates solid waste during wood milling. CM currently has a Sawdust Baghouse Dust Collector (SWMU 7) and Solvent Underground Storage Tanks (UST) (AOC 3) located northwest of the building. BA generates solid waste during grinding-wheel manufacturing. BA currently has a Grinder Baghouse Dust Collector (SWMU 8), Ovens and Dumpster (SWMU 9), and a Dilution Tank (SWMU 10). Delta currently has a CSA No. 3 (SWMU 11), and Diatomaceous Earth SAA (SWMU 12). LC does not generate solid waste; however, Waste Oil ASTs (SWMU 13) and an Underground Waste Oil Trap (SWMU 14) are located east of the building, and Styrene ASTs (AOC 1) is located northwest of the building.

The Zehrco facility currently occupies about 6 acres with Plant No. 2 occupying 160,000 square feet (ft^2) and employs about 45 people working three 8-hour shifts. The Zehrco facility access is controlled by an alarm system, security guards during the weekend, and a 6-foot chain-link fence surrounding three sides of the property. A gravel parking lot is located on the south side of the facility and is not fenced. The Morrison facility occupies about 6.7 acres. Plant No. 1 occupies about 310,000 ft^2, of which CM occupies 120,000 ft^2; BA occupies 135,000 ft^2; Delta occupies 25,000 ft^2; and LC occupies 30,000 ft^2. CM employs about 44 people working two 8-hour shifts; BA employs about 14 people working two 12-hour shifts; Delta employs about 5 people working one 8-hour shift; and LC employs one person working about 20 hours per week. The Kister facility occupies about 42 acres, of which Plant No. 3 with TW&D occupies about 270,000 ft^2. The Morrison and Kister facilities access are controlled by a 6-foot chain-link fence surrounding three sides of the property. A gravel parking lot is located on the south side of the facilities and is not fenced. Ashland occupies about 0.2 acres for transporting product material via the railroad tracks on the property. The area is fenced on the north.

The solid wastes generated by facility operations and the SWMUs where they are managed are discussed in details in Section 2.3.

2.3 WASTE GENERATION AND MANAGEMENT

Hazardous waste streams formerly generated by the MFC facility are not known. The MFC facility operated press machines that formerly generated nonhazardous waste oil while manufacturing fiberglass-reinforced plastic molding parts. The RIPD facility formerly generated spent paints (F002 and F005) and paint residues (F017). PRC was unable to determine what nonhazardous waste streams were generated by RIPD from state, federal, and facility files. Manufacturing operations were similar to the present Zehrco facility operations. The primary hazardous waste stream at the Zehrco facility is spent solvents (F002). Zehrco also generates nonhazardous waste oil. CM, BA, and Delta generate nonhazardous waste. CM generates nonhazardous sawdust waste. BA generates the following nonhazardous wastes: waste cleaning solution; spent resin; and a mixture of aluminum oxide, grit, and clay dust. Delta generates nonhazardous diatomaceous earth waste. LC and TW&D do not generate hazardous or nonhazardous waste, other than municipal trash. Ashland does not generate hazardous or nonhazardous waste on the small triangle parcel of land.

The MFC facility operated press machines that generated nonhazardous waste oil while manufacturing fiberglass-reinforced plastic molding products. The waste oil was stored in 1,000-gallon Waste Oil ASTs (SWMU 13). Waste oil overflow from the press machines was piped to an Underground Waste Oil Trap (SWMU 14). The waste oil was pumped from the ASTs and

underground trap to a tanker truck. According to Mr. Morrison, this waste was transported to an unknown location in Cleveland, Ohio. Therefore, the generation rates and disposition of these wastes are not known.

The RIPD facility generated spent paints (F002 and F005) and paint residues (F017). Manufacturing operations were similar to the Zehrco facility. According to the Part A permit application, spent paints and paint residues were stored for greater than 90 days at the Former CSA (SWMU 1) and paint residues were stored for greater than 90 days at the Former Waste Pile Storage Area (SWMU 2) (RIPD, 1980c). The generation rates and disposition of these wastes are not known.

Zehrco operates two paint booths for painting fiberglass-reinforced plastic molding products. Solvents are used in the mixing and painting operations. In 1991, about 7,315 gallons of spent solvents (F002) was generated. Spent solvents are accumulated in 55-gallon drums at one of two Spent Solvents SAAs (SWMU 5). When a 55-gallon drum is full, it is stored for less than 90 days at CSA No. 1 (SWMU 3) or CSA No. 2 (SWMU 4). The waste is transported off site to Chemical Solvents, Inc., in Cleveland, Ohio, for reclamation or disposal.

Nonhazardous waste oil is generated during equipment maintenance at the Zehrco facility. In 1991, Zehrco generated about 750 gallons of waste oil. The waste oil is currently stored in 55-gallon drums in the Waste Oil CSA (SWMU 6). The waste is transported off site to Ullman Oil, Inc., of Chagrin, Ohio, for reclamation or fuel blending.

CM operates various machines for the milling of wooden brackets. Nonhazardous sawdust is collected from milling machines and stored in the Sawdust Baghouse Dust Collector (SWMU 7). In 1991, CM generated about 300 tons of sawdust. The sawdust is transported off site to American Wood Fibers of Jessup, Maryland, for use as filler in household bread.

BA operates mixers to combine various product materials for the manufacturing of grinding wheels. A cleaning product that is considered corrosive is diluted with water to make a nonhazardous cleaning solution. The nonhazardous cleaning solution is a combination of 1 cup cleaning product and 15 gallons of water. The nonhazardous waste cleaning solution is stored in the Dilution Tank (SWMU 10) and is further diluted with water before it is discharged to the sanitary sewer.

BA uses a product phenol resin as a binding agent in manufacturing grinding wheels. Excess product phenol resin is cured in the Ovens (SWMU 9). This process generates nonhazardous spent resin. In 1991, BA generated about 460 pounds of spent resin. The waste is

disposed of in the Dumpster (SWMU 9) at BA. The waste is transported off site to Geneva Municipal Landfill, in Geneva, Ohio, for landfilling.

BA also generates a mixture of nonhazardous aluminum oxide, grit, and clay from the manufacturing of grinding wheels. The mixture of aluminum oxide, grit, and clay is collected from mixers and machines and stored in the Grinder Baghouse Dust Collector (SWMU 8). In 1991, BA generated about 18,000 pounds of the mixture of aluminum oxide, grit, and clay. The waste is transported off site directly from SWMU 8 to Geneva Municipal Landfill in Geneva, Ohio, for landfilling.

Delta uses nonhazardous diatomaceous earth as a filter when manufacturing aluminum sulfate. Once spent, the filter media is considered waste diatomaceous earth. In 1991, Delta generated about 35,000 pounds of waste diatomaceous earth. The waste diatomaceous earth is accumulated at the Diatomaceous Earth SAA (SWMU 12). When the 55-gallon drum is full, it is stored at CSA No. 3 (SWMU 11). The waste is transported off site to American Waste Services, in Warren, Ohio, for landfilling.

The facility's SWMUs are identified in Table 1. The facility layout, including SWMUs and AOCs, is shown in Figure 2. The facility's waste streams are summarized in Table 2.

2.4 HISTORY OF DOCUMENTED RELEASES

The Zehrco facility has no history of documented releases to ground water, surface water, air, or on-site soils at the facility. The Morrison and Kister facilities also have had no history of documented releases to ground water, surface water, air, and on-site soils at their facilities.

2.5 REGULATORY HISTORY

RIPD submitted a RCRA Notification of Hazardous Waste Activity Form to EPA on July 21, 1980 (RIPD, 1980a). The notification stated that the facility was operating as a large-quantity generator of hazardous waste only and listed the waste codes F002 and F005. On August 12, 1980, RIPD submitted a revised Notification of Hazardous Waste Activity Form to EPA (RIPD, 1980b). The revised notification added the waste code F017. RIPD submitted a RCRA Part A permit application on November 17, 1980 (RIPD, 1980c). The RCRA Part A permit application stated that the facility was operating as a treatment, storage, or disposal (TSD) facility. The RCRA Part A permit application specified the following capacities and process codes: 27,500 gallons of container storage (S01) capacity and 30 cubic yards of waste pile storage

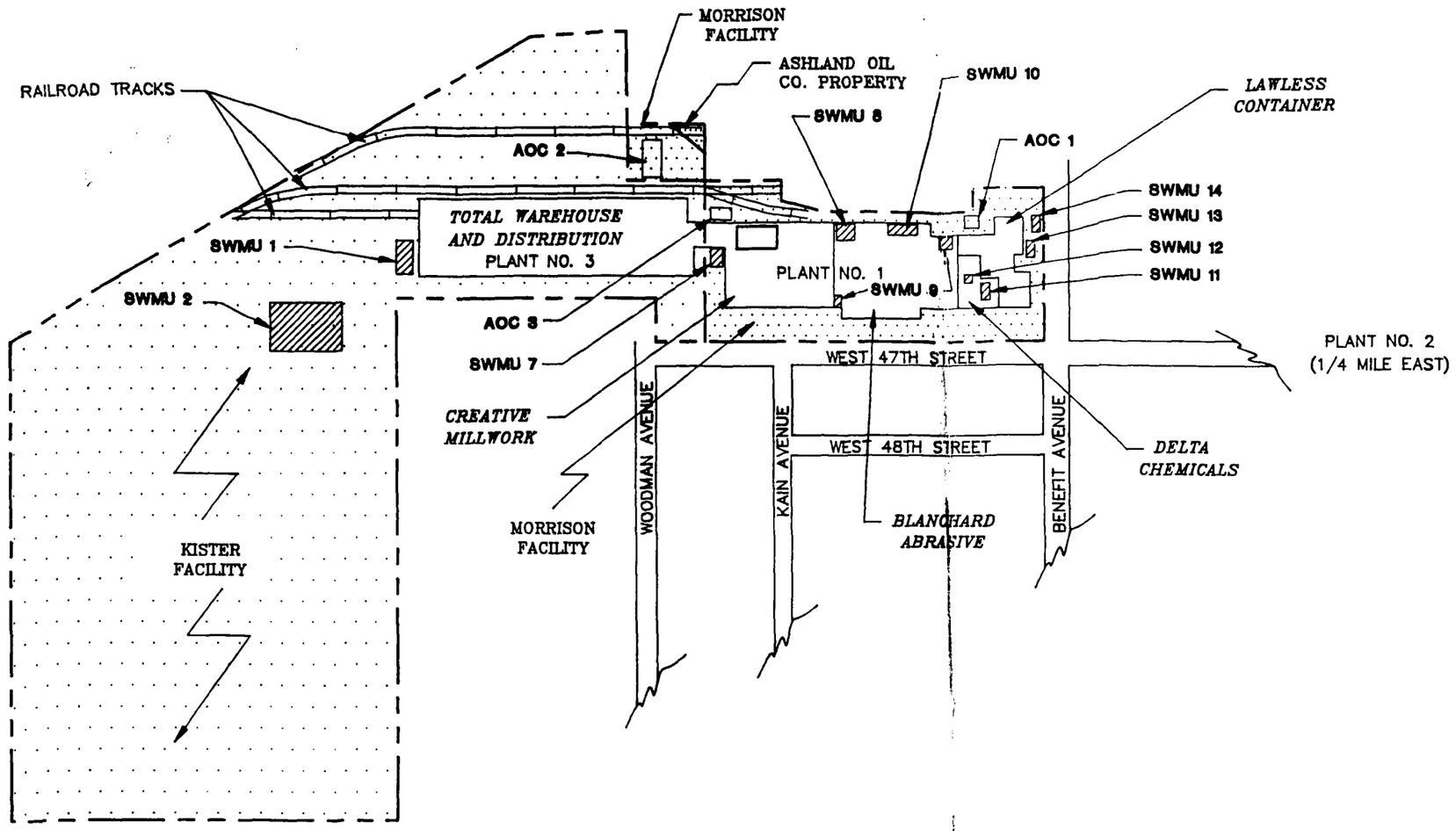
TABLE 1

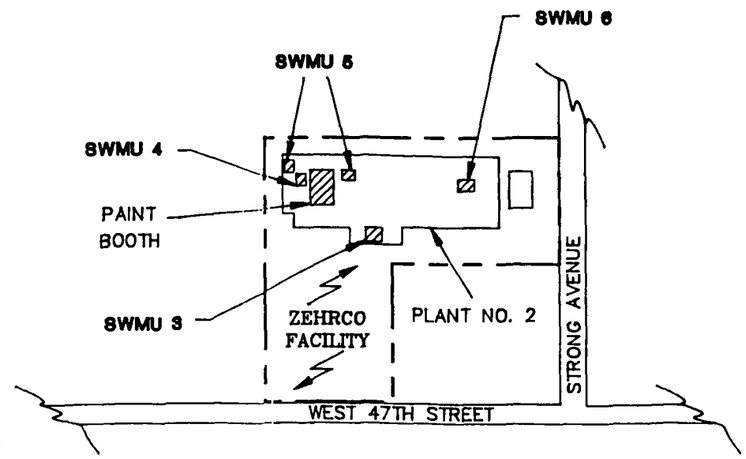
SOLID WASTE MANAGEMENT UNITS

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit[a]	Status
1	Former CSA	Yes	Inactive; closure plan approved but closure not certified
2	Former Waste Pile Storage Area	Yes	Inactive; closure plan not submitted and closure not certified
3	CSA No. 1	No	Active; less than 90-day storage of hazardous waste
4	CSA No. 2	No	Active; less than 90-day storage of nonhazardous waste
5	Spent Solvents SAAs	No	Active; accumulation of hazardous waste
6	Waste Oil CSA	No	Active; storage of nonhazardous waste
7	Sawdust Baghouse Dust Collector	No	Active; collection of nonhazardous waste
8	Grinder Baghouse Dust Collector	No	Active; collection of nonhazardous waste
9	Ovens and Dumpster	No	Active; two ovens are operable and two ovens are inoperable, and the dumpster is active
10	Dilution Tank	No	Active; dilution of nonhazardous waste
11	CSA No. 3	No	Active; storage of nonhazardous waste
12	Diatomaceous Earth SAA	No	Active; storage of nonhazardous waste
13	Waste Oil ASTs	No	Inactive; storage of nonhazardous waste
14	Underground Waste Oil Trap	No	Inactive; accumulation of nonhazardous waste

Note:

[a] A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.





LEGEND:

----	PROPERTY BOUNDARY
SWMU 1	FORMER CSA
SWMU 2	FORMER WASTE PILE STORAGE AREA
SWMU 3	CSA NO. 1
SWMU 4	CSA NO. 2
SWMU 5	SPENT SOLVENTS SATELLITE ACCUMULATION AREAS (SAA)
SWMU 6	WASTE OIL CSA
SWMU 7	SAWDUST BAGHOUSE DUST COLLECTOR
SWMU 8	GRINDER BAGHOUSE DUST COLLECTOR
SWMU 9	OVENS AND DUMPSTER
SWMU 10	DILUTION TANK
SWMU 11	CSA NO. 3
SWMU 12	DIATOMACEOUS EARTH SAA
SWMU 13	WASTE OIL ABOVEGROUND STORAGE TANKS (AST)
SWMU 14	UNDERGROUND WASTE OIL TRAP
AOC 1	STYRENE ASTs
AOC 2	2,500-GALLON PAINT ASTs
AOC 3	SOLVENT UNDERGROUND STORAGE TANKS (UST)

SOURCE: ZEHRCO PLASTICS, INC.
SKETCH RECEIVED BY PRC, OCTOBER 20, 1992

125' 0 125' 250'
SCALE: 1" = 250'

ZEHRSTE.DWG - 1/06/93 - DAZ 30RR050320H35

ZEHRCO PLASTICS, INC.
FORMERLY ROCKWELL INTERNATIONAL-
PLASTICS DIVISION
ASHTABULA, OHIO

FIGURE 2
FACILITY LAYOUT

PRC ENVIRONMENTAL MANAGEMENT, INC.

TABLE 2

SOLID WASTES

Waste/EPA Waste Code	Source	Solid Waste Management Unit
Waste oil/NA[abd]	Press machines and equipment maintenance	6, 13, and 14
Spent paints/F002 and F005[c]	Paint booths	1
Paint residues/F017[c]	Paint booths	2
Spent solvents/F002[d]	Paint booths	3, 4, and 5
Sawdust/NA[e]	Milling machines	7
Waste cleaning solution/NA[f]	Mixers	10
Spent resin/NA[f]	Manufacturing of grinding wheels	9
Mixture of aluminum oxide, grit, and clay/NA[f]	Mixers and machines	8
Waste diatomaceous earth/NA[g]	Filter process	11 and 12

Note:

[a] Not applicable (NA) designates nonhazardous waste.
[b] Designates waste generated by MFC.
[c] Designates waste generated by RIPD.
[d] Designates waste generated by Zehrco.
[e] Designates waste generated by CM.
[f] Designates waste generated by BA.
[g] Designates waste generated by Delta.

(S03) capacity. The container storage (S01) is the Former Container Storage Area (CSA) (SWMU 1) and the waste pile storage (S03) is the Former Waste Pile Storage Area (SWMU 2).

In December 1983, RIPD submitted a closure plan for the Former CSA (SWMU 1) (RIPD, 1983). The closure plan did not include the Former Waste Pile Storage Area (SWMU 2). In 1984, EPA approved the closure plan (EPA, 1984). Wastes were removed from SWMUs 1 and 2 in 1984, however, PRC found no documentation during a review of federal, state, and facility files, that RCRA closure activities for the Former CSA (SWMU 1) and Former Waste Pile Storage Area (SWMU 2) have been completed.

The Zehrco facility submitted a revised Notification of Hazardous Waste Activity Form to EPA on March 15, 1989 (Zehrco, 1989). The notification indicated a change of address from 1741 West 47th Street to 1501 West 47th Street.

On April 2, 1981, EPA inspected the RIPD facility for RCRA compliance. The RIPD facility was found in violation of inspection and contingency plan requirements (EPA, 1981). PRC found no documentation indicating that the facility achieved compliance.

The Zehrco facility is required to have operating air permits. OEPA has issued one permit for the paint booth and one permit for the molding compound preparation area (Zehrco, 1987). PRC found no documentation of the facility violating its air permits, or of odor complaints from area residents.

BA is required to have an operating air permit. OEPA has issued a permit for BA's Ovens (SWMU 9) (OEPA, 1990). PRC found no documentation of BA violating its air permit, or of odor complaints from area residents.

CM, Delta, LC, and TW&D are not required to have operating air permits.

The Zehrco, Morrison, and Kister facilities hold no other operating permits. The Zehrco, Morrison, or Kister facilities have had no CERCLA activity.

2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and ground water in the vicinity of the facility.

2.6.1 Climate

The climate in Ashtabula County is continental. The average daily temperature is 49 degrees Fahrenheit (°F). The lowest average daily temperature is 14 °F in January. The highest average daily temperature is 81 °F in July (USDA, 1973).

The total annual precipitation for the county is about 37 inches. The mean annual lake evaporation for the area is about 30 inches (DOC, 1968). The 1-year, 24-hour maximum rainfall is about 4 inches.

The prevailing wind is from the north. Average wind speed is 13 miles per hour (USDA, 1973).

2.6.2 Flood Plain and Surface Water

The Zehrco, Morrison, and Kister facilities are not located in a 100-year flood plain (FEMA, 1980). The nearest surface water body, the Ashtabula River, is located 1.25 miles east of the Zehrco facility and is used for recreational purposes. The Ashtabula River flows northwest and empties into Lake Erie about 4 miles downstream of the facilities.

The facilities do not have a National Pollutant Discharge Elimination System (NPDES) permit to discharge.

2.6.3 Geology and Soils

No site-specific geology and soil information is available. The following paragraphs discuss the regional geology and soil setting of Ashtabula County.

The Zehrco, Morrison, and Kister facilities are located within an area geologically defined as the Eastern Lake Section of the Central Lowland Province or commonly referred to as the Lake Plain. The Lake Plain borders Lake Erie and is characterized by a narrow plain with a relatively flat surface, ranging between 3.5 and 5 miles in width, and gently sloping towards Lake Erie. The northern margin of the Lake Plain along the present shoreline of Lake Erie, in the vicinity of the facilities, terminates as a bluff ranging from 20 to 80 feet in height. The Lake Plain then rises toward the south at a gradient of approximately 10 feet per mile. The southern margin is marked by an abrupt rise in elevation, or escarpment, which also marks the beginning of glacial end moraine deposits. Drainage is typically poor because of the relatively flat surface and the nature of the soils of the Lake Plain.

Lacustrine deposits consisting of silts and fine sands reportedly cover the upper surface of the Lake Plain to a depth of 5 to 10 feet. A series of till deposits that are typically composed of dense clayey silts underlie the lake silts and sands. In this area, tills generally consist of an unsorted, unstratified mixture of sediments of various sizes (often containing small rock fragments), but primarily containing fine-grained sediments. The various till layers are sometimes separated by thin lenses (4 to 6 inches) of more permeable silt or fine sand. The till units extend to the bedrock surface.

In the vicinity of the facility, bedrock is reported to be approximately 50 feet below the surface. Bedrock beneath the facility consists of Devonian Age shales, which locally may be several hundred feet thick. The uppermost formation is reported to be the Ohio shale (Cleveland Member), which is typically a black carbonaceous shale (Woodward, 1986).

2.6.4 Ground Water

No site-specific ground-water information is available. No known wells lie within a 3-mile radius of the facility (OAWC, 1992). The following paragraph discuss the regional ground-water setting of Ashtabula County.

According to information published by the Ohio Division of Geologic Survey, wells developed in the unconsolidated deposits yield very little ground water [less than 5 gallons per minute (gpm)]. Because of the low permeability of the unconsolidated deposits, wells in these materials are generally pumped dry quickly and take a considerable amount of time to fully recover. Wells developed in the upper, weathered portion of the shales typically yield less than 3 gpm. Below that depth, very minimal supplies are available (Woodward, 1986).

Ground water is generally considered an unavailable and unimportant source of water in this region. The Ohio American Water Co. has no record of potable water wells within 3 miles of the site (OAWC, 1992). Ashtabula County water supplies come from Lake Erie. The Zehrco, Morrison, and Kister facilities have no on-site industrial ground-water wells. Ground water flows in the same direction as surface water, in a easterly direction towards the Ashtabula River, which flows northwest and eventually empties into Lake Erie.

2.7 RECEPTORS

The Zehrco facility occupies 6 acres; the Morrison facility occupies about 6.7 acres; the Kister facility occupies about 42 acres; and Ashland occupies about 0.2 acres in an industrial and residential area in Ashtabula, Ohio. Ashtabula has a population of about 23,000.

The Zehrco facility is bordered on the north by Reliance Electric Company and vacant land; on the west by ITEN, Inc.; on the south by a residential area and MFC; and on the east by West Avenue Junior High School. The Morrison and Kister facilities are bordered on the north by Ashland; on the west and south by vacant land; and on the east by ITEN, Inc. The nearest school, West Avenue Junior High School, is located about 400 feet east of the Zehrco facility. Zehrco facility access is controlled by an alarm system, security guards during the weekend, and a 6-foot chain-link fence surrounding three sides of the property. A gravel parking lot is located on the south side of the facility and is not fenced. The Morrison and Kister facilities access are controlled by a 6-foot chain-link fence surrounding three sides of the property. A gravel parking lot is located on the south side of the facilities and is not fenced. Ashland occupies about 0.2 acres for transporting product material via the railroad tracks on the property. The area is fenced on the north.

The nearest surface water body, the Ashtabula River, is located 1.25 miles east of the facility and is used for recreational purposes. The Ashtabula River flows northwest and empties into Lake Erie about 4 miles downstream of the facility. The facilities do not have a NPDES permit to discharge.

Ground-water is not used as an drinking water supply for the city of Ashtabula. No known wells are located within a 3-mile radius of the facility. Ashtabula County water supplies come from Lake Erie. The Zehrco, Morrison, and Kister facilities have no on-site industrial ground-water wells (OAWC, 1992). Ground water flows in the same direction as surface water, in a easterly direction towards the Ashtabula River, which flows northwest and eventually empties into Lake Erie.

One sensitive environment, a small wetland area less than 1 acre in size is located about 0.25 mile northwest of the facility. No other sensitive environments lie within a 2-mile radius of the facility (USGS, 1970 and 1988).

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the 14 SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC's observations. Figure 2 shows the SWMU locations.

SWMU 1	**Former CSA**
Unit Description:	This unit is outdoors and west and adjacent to the wall of Plant No. 3. Mr. Kister currently owns Plant No. 3 and TW&D occupies it. According to Mr. Morrison, this unit consisted of 55-gallon steel drums on soil and measured about 10 by 5 feet. This unit operated as a greater than 90-day storage area for hazardous waste.
Date of Startup:	This unit began operation in early 1970s.
Date of Closure:	This unit has been inactive since 1984. In December 1983, RIPD submitted a closure plan to EPA for the unit. In 1984, EPA approved the closure plan, but PRC found no documentation that the unit has been RCRA closed. The wastes were removed from the unit in 1984.
Wastes Managed:	This unit managed spent paints (F002 and F005) for greater than 90-days before off site disposal.
Release Controls:	This unit had no release controls.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	The unit contained no hazardous waste during the VSI. The soils in the area were covered with snow; therefore, it is not known if the soil was stained or if the vegetation in the area was stressed. PRC noted no evidence of release (see Photograph No. 1).

SWMU 2	**Former Waste Pile Storage Area**
Unit Description:	The unit is outdoors and southwest of Plant No. 3. This unit consisted of dry paint residues on gravel and broken asphalt pavement. The size of the unit is not known. The unit operated as a greater than 90-day storage area for hazardous waste.
Date of Startup:	This unit began operation in early 1970s.
Date of Closure:	This unit has been inactive since 1984. In December 1983, RIPD submitted a closure plan to EPA for the unit. In 1984, EPA approved the closure plan, but PRC found no documentation that the unit has been RCRA closed. The wastes were removed from the unit in 1984.
Wastes Managed:	This unit managed paint residues (F017) for greater than 90-days before storage in SWMU 1 or off site disposal.
Release Controls:	This unit had no release controls.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	The unit contained no hazardous waste during the VSI. The area had some dark stains and stressed vegetation in the area (see Photograph No. 2).
SWMU 3	**CSA No. 1**
Unit Description:	This unit is indoors in the south area of Plant No. 2. Zehrco currently owns and occupies Plant No. 2. The unit is used to store 55-gallon steel drums on a concrete floor and measures about 10 by 5 feet. This unit operates as a less than 90-day storage area for hazardous waste.
Date of Startup:	This unit began operation in 1987.
Date of Closure:	This unit is active.

Wastes Managed:	This unit manages spent solvents (F002) generated by the paint booth. The waste is transported to Chemical Solvents, Inc., in Cleveland, Ohio, for reclamation and disposal.
Release Controls:	This unit is located indoors on a concrete floor. No floor drains were visible during the VSI.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	This unit contained seven 55-gallon steel drums of spent solvents (F002) during the VSI. PRC noted no evidence of release. No cracks in the concrete floor or visible evidence of spills were observed (see Photograph No. 3).
SWMU 4	**CSA No. 2**
Unit Description:	This unit is indoors adjacent to the paint booth in Plant No. 2. The unit is used to store 55-gallon steel drums on a concrete floor and measures about 5 by 3 feet. This unit operates as a less than 90-day storage area for hazardous waste.
Date of Startup:	This unit began operations in 1987.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages spent solvents (F002) from the paint booth. The waste is transported to Chemical Solvents, Inc., in Cleveland, Ohio, for reclamation and disposal.
Release Controls:	This unit is located indoors on a concrete floor. No floor drains were visible during the VSI.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	The unit contained two 55-gallon steel drums of spent solvents (F002) during the VSI. No cracks in the concrete floor or visible evidence of spills were observed (see Photograph No. 4).

SWMU 5	**Spent Solvents SAAs**
Unit Description:	This unit consists of two 55-gallon steel drums located indoors in two separate areas in the northwest portion of Plant No. 2. The steel drums are located on a concrete floor and measures about 3 by 3 feet. This unit operates as an accumulation area for hazardous waste.
Date of Startup:	This unit began operation in 1987.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages spent solvents (F002). The waste is transported to Chemical Solvents, Inc., in Cleveland, Ohio, for reclamation and disposal.
Release Controls:	This unit is located indoors on a concrete floor. No floor drains were visible during the VSI.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	The unit contained about 30 gallons of spent solvents (F002) in both accumulation areas during the VSI. No cracks in the concrete floor or visible evidence of spills were observed (see Photographs No. 5 and 6).
SWMU 6	**Waste Oil CSA**
Unit Description:	This unit is indoors in the northeast area of Plant No. 2. The unit consists of 55-gallon steel drums on a concrete floor and measures about 20 by 5 feet. This unit operates as a storage area for nonhazardous waste oil.
Date of Startup:	This unit began operation in 1984.
Date of Closure:	This unit is active.

Wastes Managed:	This unit manages nonhazardous waste oil. This waste is transported to Ullman Oil, Inc., in Chagrin, Ohio, for reclamation and fuel blending.
Release Controls:	This unit is located indoors on a concrete floor. No drains were visible during the VSI.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	The unit contained 10 55-gallon steel drums of nonhazardous waste oil during the VSI. No cracks in the concrete floor or visible evidence of spills were observed (see Photograph No. 7).
SWMU 7	**Sawdust Baghouse Dust Collector**
Unit Description:	This unit is outdoors and southwest of Plant No. 1. Mr. Morrison currently owns Plant No. 1 and CM rents this area from Mr. Morrison. This unit consists of a baghouse dust collector and a 10-cubic-yard container beneath the collector. The baghouse dust collector consists of a cyclone, 200 bags, and an air blower. The baghouse dust collector is cylindrical and constructed of steel. The container is also constructed of steel. The unit measures 12 feet in diameter and 30 feet in length. This unit collects nonhazardous sawdust waste.
Date of Startup:	This unit began operation in 1987.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages nonhazardous sawdust. This waste is transported to American Wood Fibers in Jessup, Maryland, for use as filler in household bread.
Release Controls:	This unit is located outdoors on a concrete pad.
History of Documented Releases:	No releases from this unit have been documented.

Observations:	The unit contained about 5 cubic yards of sawdust during the VSI. No cracks in the concrete pad or visible evidence of spills were observed (see Photograph No. 8).
SWMU 8	**Grinder Baghouse Dust Collector**
Unit Description:	This unit is indoors in the north area of Plant No. 1. BA currently rents this area from Mr. Morrison. This unit consists of a baghouse dust collector and a 55-gallon drum. The baghouse dust collector consists of a cyclone, 24 bags, and an air blower. The baghouse dust collector is cylindrical and constructed of galvanized steel. The unit measures 4 feet in diameter and 20 feet in length. This unit collects nonhazardous grinder waste.
Date of Startup:	This unit began operation in 1989.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages a nonhazardous mixture of aluminum oxide, grit, and clay. This waste is transported off site to Geneva Municipal Landfill, in Geneva, Ohio, for landfilling.
Release Controls:	This unit is located indoors on a concrete floor. No floor drains were visible during the VSI.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	The unit contained about 30 gallons of a mixture of aluminum oxide, grit, and clay during the VSI. No cracks in the concrete floor or visible evidence of spills were observed (see Photographs No. 9 and 10).
SWMU 9	**Ovens and Dumpster**
Unit Description:	The ovens are indoors in the northwest area of Plant No. 1. BA rents this area from Mr. Morrison. The unit consists of four ovens, of which two are operable, and one dumpster. The ovens are located on a concrete floor and each oven measures 8 by 6 by 8 feet. The ovens are constructed of steel and are powered by

	electricity. The ovens operate as curing ovens for nonhazardous waste. The dumpster is located indoors in the southwest area of the building. The dumpster is located on a concrete floor and holds about 20 cubic yards of nonhazardous waste.
Date of Startup:	This unit began operation in 1989.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages nonhazardous spent resin. This waste is transported off site to Geneva Municipal Landfill in Geneva, Ohio, for landfilling.
Release Controls:	This unit is located indoors on a concrete floor. No floor drains were visible during the VSI.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	The unit contained no nonhazardous waste during the VSI. No cracks in the concrete floor or visible evidence of spills were observed (see Photograph No. 11).
SWMU 10	**Dilution Tank**
Unit Description:	This unit is indoors in the north area of Plant No. 1. BA rents this area from Mr. Morrison. This unit consists of a steel tank on a concrete floor and measures 15 by 3 by 2.5 feet. The unit's capacity is about 500 gallons and is constructed of fiberglass. This unit is used to dilute nonhazardous waste with water prior to discharge.
Date of Startup:	This unit began operations in 1989.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages nonhazardous waste cleaning solution. After it is diluted in the tank, this waste is discharged to the sanitary sewer.

Release Controls:	This unit is located indoors on a concrete floor. No floor drains were visible during the VSI.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	The unit contained about 300 gallons of nonhazardous waste during the VSI. No cracks in the concrete floor or visible evidence of spills were observed (see Photograph No. 12).
SWMU 11	**CSA No. 3**
Unit Description:	This unit is indoors in the southeast area of Plant No. 1. Delta rents this area from Mr. Morrison. The unit is used to store 55-gallon drums on a concrete floor and measures about 12 by 40 feet. This unit operates as a less than 90-day storage area for nonhazardous waste.
Date of Startup:	This unit began operation in 1987.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages nonhazardous diatomaceous earth. The waste is transported off site to American Waste Services, in Warren, Ohio, for landfilling.
Release Controls:	This unit is located indoors on a concrete floor. No floor drains were visible during the VSI.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	The unit contained one 55-gallon drum of nonhazardous diatomaceous earth during the VSI. No cracks in the concrete floor were observed. PRC observed small amounts of nonhazardous waste on the concrete floor (see Photograph No. 13).

SWMU 12	**Diatomaceous Earth SAA**
Unit Description:	This unit is indoors in the southeast area of Plant No. 1. Delta rents this area from Mr. Morrison. The unit consists of a 55-gallon drum on concrete floor and measures about 5 by 5 feet. This unit operates as an accumulation area for nonhazardous waste.
Date of Startup:	This unit began operation in 1987.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages nonhazardous diatomaceous earth. This waste is stored in SWMU 11 before it is transported off site to American Waste Services in Warren, Ohio, for landfilling.
Release Controls:	This unit is located indoors on a concrete floor. No floor drains were visible during the VSI.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	The unit contained about 45 gallons of nonhazardous diatomaceous earth during the VSI. No cracks in the concrete floor were observed. PRC observed small amounts of nonhazardous waste on the concrete floor (see Photograph No. 14).
SWMU 13	**Waste Oil ASTs**
Unit Description:	This unit is outdoors on a concrete pad and east of Plant No. 1. Mr. Morrison owns this property. According to Mr. Morrison, the unit consists of two 1,000-gallon ASTs and are constructed of steel. It is not known if the unit is empty.
Date of Startup:	This unit began operation in 1954.
Date of Closure:	This unit has been inactive since the early 1970s.
Wastes Managed:	This unit managed nonhazardous waste oil. According to Mr. Morrison, the waste oil was pumped from the unit into tanker

	trucks and disposed of off site to an unknown location in Cleveland, Ohio.
Release Controls:	This unit is located outdoors on a concrete pad. The unit had a 6-inch concrete berm surrounding it.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	PRC could not observe if the unit contained waste. No cracks in the concrete pad or visible evidence of spills were observed (see Photograph No. 15).
SWMU 14	**Underground Waste Oil Trap**
Unit Description:	The unit is outdoors in soil and east of Plant No. 1. Mr. Morrison owns this property. The unit consists of four compartments and measures 1 by 1 by 15 feet. The unit is constructed of steel. According to Mr. Morrison, the unit holds nonhazardous waste oil that overflows from presses in Plant No. 1. Currently, it is not known if pipes leading from the plant to the unit trap are sealed.
Date of Startup:	This unit began operation in 1954.
Date of Closure:	This unit has been inactive since the early 1970s.
Wastes Managed:	This unit managed nonhazardous waste oil. According to Mr. Morrison, the waste oil was pumped from the unit into tanker trucks and disposed of off site to an unknown location in Cleveland, Ohio.
Release Controls:	The unit has no secondary containment and has not had an integrity assessment conducted.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	The unit contained about 100 gallons of water during the VSI. PRC noted an oily sheen on the surface of the water. The soils in the area were covered with snow; therefore, it is not known if the

soil was stained or if the vegetation in the area was stressed (see Photographs No. 16 and 17).

4.0 AREAS OF CONCERN

PRC identified three AOCs during the PA/VSI. These AOCs are discussed below; their locations are shown in Figure 2.

AOC 1 **Styrene ASTs**

This AOC is outdoors on concrete and northwest of Plant No. 1. Mr. Morrison owns this property. According to Mr. Morrison, the AOC consists of two 750-gallon ASTs that are constructed of steel. Also, Mr. Morrison claimed that the AOC managed product liquid styrene monomer used to manufacture polyester resins and that one AST is empty and the other contains nonhazardous solidified styrene. The AOC began operation in the early 1970s. This AOC has been inactive since 1984. This AOC had a one-foot concrete bermed area surrounding it. No releases from this AOC have been documented (see Photograph No. 18).

AOC 2 **2,500-Gallon Paint ASTs**

This AOC is outdoors on soil and northwest of Plant No. 3. Mr. Morrison owns this property. It consists of five 2,500-gallon ASTs constructed of steel. The AOC managed product paint for manufacturing operations. It is not known if the 2,500-gallon ASTs are empty. The AOC began operation in the early 1970s. This AOC has been inactive since 1984. The AOC had no release controls. The AOC did not have secondary containment. No releases from this AOC have been documented. The soils in the area were not stained. PRC noted that the ASTs were lying on their sides (see Photograph No. 19).

AOC 3 **Solvent USTs**

This AOC is outdoors and north of Plant No. 1. Mr. Morrison owns this property. According to Mr. Morrison, the AOC consists of two 1,000-gallon USTs constructed of steel. The AOC managed product solvents for manufacturing operations. The USTs began operation in the early 1970s. The USTs have been inactive since 1984. These USTs had no release controls. No releases from the USTs have been documented. Vegetation in the area did not appear to be stressed. According to Mr. Joseph Estock of CM, the AOC currently contains water. The USTs are about 20 years old. The USTs could still contain hazardous constituents from the storage of product solvents. According to Mr. Morrison, the USTs have no secondary containment and have not had integrity assessments conducted (see Photograph No. 20).

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified 14 SWMUs and three AOCs at the Zehrco facility. Background information on the facility's location; operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. AOCs are discussed in Section 4.0. Following are PRC's conclusions and recommendations for each SWMU and AOC. Table 3, at the end of this section, summarizes the SWMUs and AOCs at the facility and the recommended further actions.

SWMU 1 **Former CSA**

Conclusions: This unit is outdoors on soil and west and adjacent to the wall of Plant No. 3. This unit operates as a greater than 90-day hazardous waste storage area. This unit has been inactive since 1984, but it has not been RCRA closed. In December 1983, RIPD submitted a closure plan for the unit. In 1984, EPA approved the closure plan. Wastes were removed from the unit, however, PRC found no documentation during a review of federal, state, and facility files, that RCRA closure activities for the unit have been completed. No documented releases have occurred from this unit. The potential for release to ground water, surface water, air, and on-site soils is low because it has had no documented releases and it currently does not manage any hazardous waste.

Recommendations: PRC recommends that the facility should initiate RCRA closure activities.

SWMU 2 **Former Waste Pile Storage Area**

Conclusions: This unit is outdoors on gravel and broken asphalt pavement and southwest of Plant No. 3. The unit operated as a greater than 90-day hazardous waste storage area. This unit has been inactive since 1984, but it has not been RCRA closed. In December 1983, RIPD submitted a closure plan but it did not include this unit. Wastes were removed from the unit, however, PRC found no documentation during a review of federal, state, and facility files, that RCRA closure activities for the unit have been completed. No documented releases have occurred from this unit. However, the area had some dark stains and some vegetation in the area appeared to be stressed. The potential for release to on-site soil is low to

moderate because of releases to the soil. The potential for release to ground water, surface water, air, and on-site soils is low because it has had no documented releases and it currently does not manage any hazardous waste.

Recommendations: PRC recommends that the facility should initiate RCRA closure activities.

SWMU 3 **CSA No. 1**

Conclusions: This unit is indoors in the south area of Plant No. 2 and currently operates as a less than 90-day hazardous waste storage area. No documented releases have occurred from this unit. The potential for release to ground water, surface water, air, and on-site soils is low because it is located indoors on a concrete floor with no visible cracks and it appears to be properly maintained. Also, no visible evidence of spills were observed.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 4 **CSA No. 2**

Conclusions: This unit is indoors adjacent to the paint booth in Plant No. 2 and currently operates as a less than 90-day hazardous waste storage area. No documented releases have occurred from this unit. The potential for release to ground water, surface water, air, and on-site soils is low because it is located indoors on a concrete floor with no visible cracks and it appears to be properly maintained. Also, no visible evidence of spills were observed.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 5 **Spent Solvents SAAs**

Conclusions: This unit is indoors on a concrete floor in the southwest area of Plant No. 2 and currently operates as an accumulation area for hazardous waste. No documented releases have occurred from this unit. The potential for release to ground water, surface water, air, and on-site soils is low because it is located indoors on a concrete floor with no visible cracks and it appears to be properly maintained. Also, no visible evidence of spills were observed.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 6 **Waste Oil CSA**

Conclusions: This unit is indoors on a concrete floor in the northeast area of Plant No. 2 and currently operates as a storage area for nonhazardous waste. No documented releases have occurred from this unit. The potential for release to ground water, surface water, air, and on-site soils is low because it is located indoors on a concrete floor with no visible cracks and it currently manages nonhazardous waste. Also, no visible evidence of spills were observed.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 7 **Sawdust Baghouse Dust Collector**

Conclusions: This unit is outdoors on a concrete pad and southwest of Plant No. 1, and currently collects nonhazardous waste. No documented releases have occurred from this unit. The potential for release to ground water, surface water, air, and on-site soils is low because it is on a concrete pad and it currently manages nonhazardous waste. Also, no visible evidence of spills were observed.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 8 **Grinder Baghouse Dust Collector**

Conclusions: This unit is indoors on a concrete floor in the north area of Plant No. 1 and currently collects nonhazardous waste. No documented releases have occurred from this unit. The potential for release to ground water, surface water, air, and on-site soils is low because it is located indoors on a concrete floor with no visible cracks and it currently manages nonhazardous waste. Also, no visible evidence of spills were observed.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 9 **Ovens and Dumpster**

Conclusions: The ovens are indoors on a concrete floor in the northwest area of Plant No. 1 and currently operate as curing ovens for hazardous waste. The

dumpster is located indoors on a concrete floor in the southwest area of the building. The dumpster currently holds about 20 cubic yards of nonhazardous waste. No documented releases have occurred from this unit. The potential for release to ground water, surface water, air, and on-site soils is low because it is located indoors on a concrete floor with no visible cracks and it currently manages nonhazardous waste. Also, no visible evidence of spills were observed.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 10 **Dilution Tank**

Conclusions: This unit is indoors on a concrete floor in the north area of Plant No. 1 and currently used to dilute nonhazardous waste with water prior to discharge. No documented releases have occurred from this unit. The potential for release to ground water, surface water, air, and on-site soils is low because it is located indoors on a concrete floor and it currently manages nonhazardous waste. Also, no visible evidence of spills were observed.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 11 **CSA No. 3**

Conclusions: This unit is indoors on a concrete floor in the southeast area of Plant No. 1 and currently operates as a less than 90-day nonhazardous waste storage area. No documented releases have occurred from this unit. The potential for release to ground water, surface water, air, and on-site soils is low because it is located indoors on a concrete floor with no visible cracks and it currently manages nonhazardous waste.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 12 **Diatomaceous Earth SAA**

Conclusions: This unit is indoors on a concrete floor in the southeast area of Plant No. 1 and currently operates as an accumulation area for nonhazardous waste. No documented releases have occurred from this unit. The potential for release to ground water, surface water, air, and on-site soils is low because

it is located indoors on a concrete floor with no visible cracks and it currently manages nonhazardous waste.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 13 **Waste Oil ASTs**

Conclusions: This unit is outdoors on a concrete pad west of Plant No. 1 and operated as storage for nonhazardous waste oil. No documented releases have occurred from this unit. The potential for release to ground water, surface water, air, and on-site soils is low because it is on a concrete pad with a 6-inch concrete berm surrounding it and it appears to be properly maintained.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 14 **Underground Waste Oil Trap**

Conclusions: The unit is outdoors on soil east of Plant No. 1. The current operations of this unit are not known. No documented releases have occurred from this unit. The potential for release to ground water and on-site soils is low to moderate because it is not known if pipes from Plant No. 1 leading to the unit are sealed. The unit has no secondary containment and has not had an integrity assessment conducted. The potential for release to surface water and air is low.

Recommendations: PRC recommends that the unit be further investigated to determine if the pipes are sealed or the source of the oily sheen on the surface of the water can be determined.

AOC 1 **Styrene ASTs**

Conclusions: This AOC is outdoors on a concrete pad and northwest of Plant No. 1. According to Mr. Morrison, the AOC managed product liquid styrene monomer used to manufacture polyester resins and that one AST is empty and the other contains nonhazardous solidified styrene. No documented releases have occurred from this AOC. The potential for release to on-site soils is low to moderate because it is not known if the AOC is empty or if it contains hazardous constituents. The potential for release to ground water, surface water, and air is low.

Recommendations: PRC recommends that the facility should determine if the one AST is empty and that the other AST does not contain hazardous constituents.

AOC 2 **2,500-Gallon Paint ASTs**

Conclusions: This AOC is outdoors on soil and northwest of Plant No. 3 and operated as a storage for paint products. No documented releases have occurred from this AOC. The potential for release to surface water and air is low. The potential for release to ground water and on-site soils is low to moderate because the ASTs are lying on their sides and it is not known if the ASTs are empty or if the ASTs contain hazardous constituents.

Recommendations: PRC recommends the facility should determine if the 2,500-Gallon Paint ASTs are empty or if the ASTs contain hazardous constituents.

AOC 3 **Solvent USTs**

Conclusions: This AOC is outdoors and north of Plant No. 1 and operated as a storage for product solvents. The USTs are about 20 years old. The USTs could still contain hazardous constituents from the storage of product solvents. According to Mr. Morrison, the USTs have no secondary containment and have not had integrity assessments conducted. No documented releases have occurred from this AOC. The potential for release to ground water and on-site soils is moderate to high because it is not known if the water in the USTs contain a hazardous constituent or if the USTs are leaking. The potential for release to surface water and air is low.

Recommendations: PRC recommends that the liquid in the USTs and the soil in the area should be sampled and analyzed for hazardous constituents and that the USTs should be removed and properly disposed of.

TABLE 3

SWMU AND AOC SUMMARY

SWMU	Dates of Operation	Evidence of Release	Recommended Further Action
1. Former CSA	Early 1970s to 1984	None	Initiate RCRA closure activities
2. Former Waste Pile Storage Area	Early 1970s to 1984	None	Initiate RCRA closure activities
3. CSA No. 1	1987 to present	None	No further action at this time
4. CSA No. 2	1987 to present	None	No further action at this time
5. Spent Solvents SAAs	1987 to present	None	No further action at this time
6. Waste Oil CSA	1984 to present	None	No further action at this time
7. Sawdust Baghouse Dust Collector	1987 to present	None	No further action at this time
8. Grinder Baghouse Dust Collector	1989 to present	None	No further action at this time
9. Ovens and Dumpster	1989 to present	None	No further action at this time
10. Dilution Tank	1989 to present	None	No further action at this time
11. CSA No. 3	1987 to present	None	No further action at this time
12. Diatomaceous Earth SAA	1987 to present	None	No further action at this time
13. Waste Oil ASTs	1954 to early 1970s	None	No further action at this time
14. Underground Waste Oil Trap	1954 to early 1970s	None	Determine if pipes are sealed and the source of the oily sheen on the surface of the water

TABLE 3 (Continued)
SWMU AND AOC SUMMARY

AOC	Dates of Operation	Evidence of Release	Recommended Further Action
1. Styrene ASTs	Early 1970s to 1984	None	Determine if the one AST is empty and that the other AST contains hazardous constituents
2. 2,500-Gallon Paint ASTs	Early 1970s to 1984	None	Determined if the ASTs are empty or if they contain hazardous constituents.
3. Solvent USTs	Early 1970s to 1984	None	The liquid in the USTs and the soil in the area should be sampled and analyzed for hazardous constituents; and remove and properly dispose of the USTs

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Ohio Environmental Protection Agency (OEPA), 1990. Letter to Blanchard Abrasive Regarding Air Permit, May 11.

Rockwell International Plastics Division (RIPD), 1980a. RCRA Notification of Hazardous Waste Activity Form, July 21.

RIPD, 1980b. Revised RCRA Notification of Hazardous Waste Activity Form, August 12.

RIPD, 1980c. RCRA Part A Permit Application, November 13.

RIPD, 1983. RIPD Submitted a Closure Plan for the Container Storage Area to OEPA, December.

U.S. Department of Agriculture (USDA), 1973. Soil Survey of Ashtabula County, May.

U.S. Department of Commerce (DOC), 1968. Climatic Atlas of the United States.

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EPA, 1984. Letter to RIPD Regarding the Approval of RIPD's Closure Plan.

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Zehrco Plastics, Inc. (Zehrco), 1987. Zehrco Submitted Air Permits to OEPA for the Paint Booth and Molding Compound Preparation Area.

Zehrco, 1989. Revised RCRA Notification of Hazardous Waste Activity Form to EPA, March 15.

ATTACHMENT A
VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

Zehrco Plastics, Inc.
(formerly Rockwell International-Plastics Division)
1501 West 47th Street
Ashtabula, Ohio 44004
OHD 064 098 262

Date:	October 28, 1992
Primary Facility Representative:	Jack Plyler, Manufacturing Manager
Representative Telephone No.:	(216) 998-5774
Additional Facility Representatives:	Ted Herbert, Environmental & Safety Compliance Consulting, Industrial Specialist (216) 428-4231
Inspection Team:	Lorraine Morris, PRC Environmental Management, Inc. (PRC) Mary Joyce Freibert, PRC
Photographer:	Mary Joyce Freibert, PRC
Weather Conditions:	Sunny and cool, 64 °F
Summary of Activities:	PRC inspected the Zehrco facility. The visual site inspection (VSI) began at 10:30 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the facility's past and current operations, solid wastes generated at the facility, and the facility's release history. Facility representatives provided the inspection team with copies of requested documents. The VSI tour began at 12:45 p.m. PRC inspected current container storage areas (CSA) (SWMUs 3, 4, and 6) and satellite accumulation areas (SAA) (SWMU 5). The tour concluded at 1:15 p.m., after which the inspection team held an exit meeting with facility representatives. The VSI was completed and the inspection team left the facility at 1:30 p.m.

VISUAL SITE INSPECTION SUMMARY (Continued)

Zehrco Plastics, Inc.
(formerly Rockwell International-Plastics Division)
1501 West 47th Street
Ashtabula, Ohio 44004
OHD 064 098 262

Date:	November 16, 1992
Primary Facility Representative:	George Stecki, Blanchard Abrasive, Manager
Representative Telephone No.:	(216) 992-7300
Additional Facility Representatives:	Robert Morrison (Owner of Plant No. 1) (216) 993-6886
Inspection Team:	Lorraine Morris, PRC Sandy Anagnostopoulos, PRC
Photographer:	Lorraine Morris, PRC
Weather Conditions:	Cool, 54 °F
Summary of Activities:	PRC inspected Blanchard Abrasive that rents from Mr. Morrison. The visual site inspection (VSI) began at 4:30 p.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the facility's past and current operations, solid wastes generated at the facility, and the facility's release history. Facility representatives provided the inspection team with copies of requested documents. The VSI tour began at 5:00 p.m. PRC inspected the Grinder Baghouse Dust Collector (SWMU 8), Ovens and Dumpster (SWMU 9), and the Dilution Tank (SWMU 10). The tour concluded at 6:00 p.m. after which the inspection team held an exit meeting with facility representatives. The VSI was completed and the inspection team left the facility at 6:20 p.m.

VISUAL SITE INSPECTION SUMMARY (Continued)

Zehrco Plastics, Inc.
(formerly Rockwell International-Plastics Division)
1501 West 47th Street
Ashtabula, Ohio 44004
OHD 064 098 262

Date:	November 17, 1992
Primary Facility Representative:	Joe Estock, Creative Millwork, Manager
Representative Telephone No.:	(216) 992-3566
Additional Facility Representatives:	Jack Felde, Delta Chemicals, Manager (216) 992-7039 Ron Marchewaka, Lawless Container, Manager (216) 428-5116 Ronald Kister, Kister Construction Company (Owner of Plant No. 3) (216) 992-4545
Inspection Team:	Lorraine Morris, PRC Sandy Anagnostopoulos, PRC
Photographer:	Lorraine Morris, PRC
Weather Conditions:	Cool, 60 °F
Summary of Activities:	PRC inspected the following companies that rent from Mr. Morrison: Creative Millwork, Delta Chemicals, and Lawless Container; and Total Warehouse and Distribution that rents from Mr. Kister. The visual site inspection (VSI) began at 2:20 p.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the facility's past and current operations, solid wastes generated at the facility, and the facility's release history. Facility representatives provided the inspection team with copies of requested documents. The VSI tour began at 2:45 p.m. PRC inspected a Sawdust Baghouse Dust Collector (SWMU 7), current and former container storage areas (CSA) (SWMUs 1 and 11), Former Waste Pile Storage Area (SWMU 2), Diatomaceous Earth Satellite Accumulation Area (SAA) (SWMU 12), former aboveground storage tanks (AST) (SWMU 13 and AOCs 1 and 2), the Underground Waste Oil Trap (SWMU 14), and the Solvent USTs (AOC 3). The tour concluded at 4:15 p.m., after which the inspection team held an exit meeting with facility representatives. The VSI was completed and the inspection team left the facility at 4:30 p.m.

Photograph No. 1 Location: SWMU 1
Orientation: East Date: 11/17/92
Description: Former CSA located adjacent to the building wall and right of the green automobile

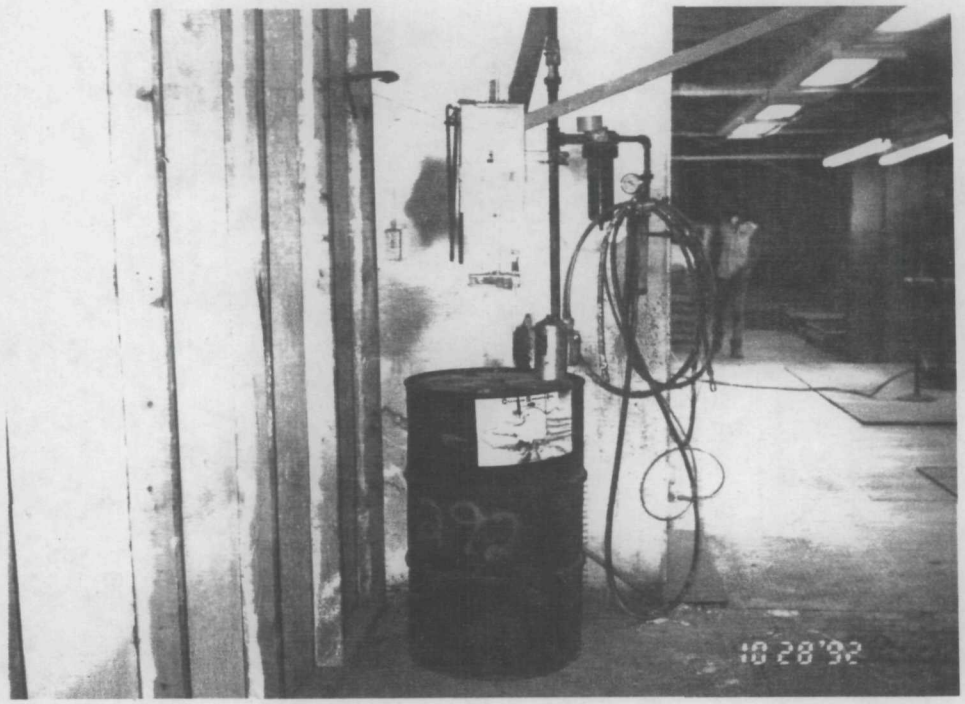
Photograph No. 2 Location: SWMU 2
Orientation: West Date: 11/17/92
Description: Former Waste Pile Storage Area is on gravel and broken asphalt pavement. The area had some dark stains and stressed vegetation in the area

Photograph No. 3
Orientation: South
Description: CSA No. 1 located on a concrete floor with no visible cracks

Location: SWMU 3
Date: 10/28/92

Photograph No. 4
Orientation: East
Description: CSA No. 2 located on a concrete floor with no visible cracks

Location: SWMU 4
Date: 10/28/92

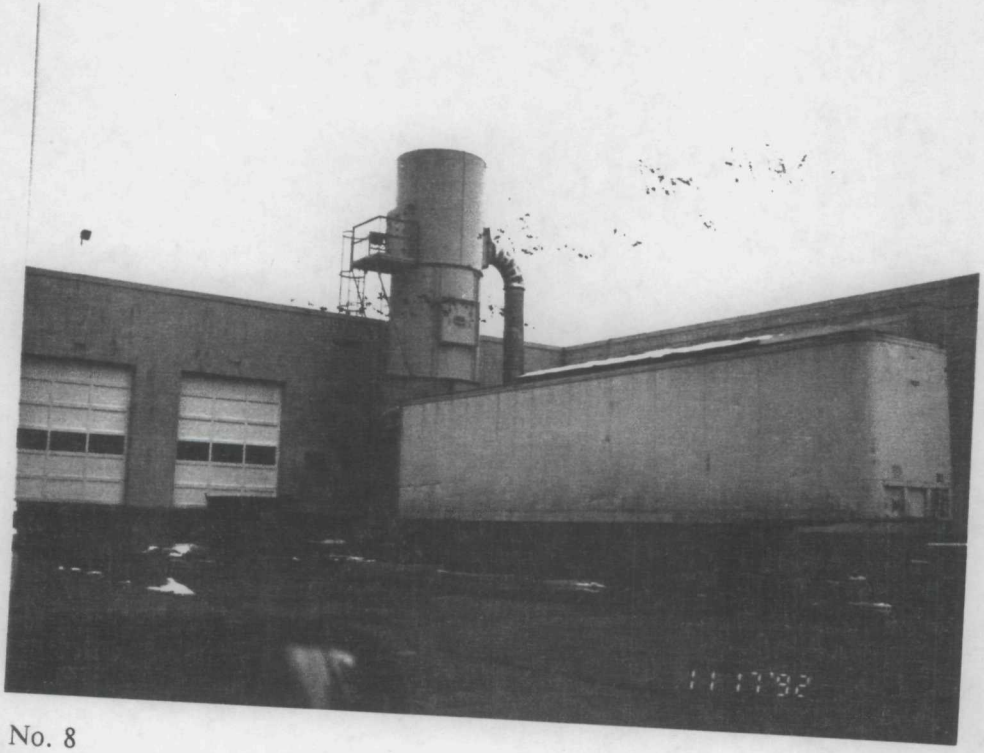


Photograph No. 5 Location: SWMU 5
Orientation: West Date: 10/28/92
Description: East Spent Solvents SAA located on a concrete floor with no visible cracks

Photograph No. 6 Location: SWMU 5
Orientation: West Date: 10/28/92
Description: West Spent Solvents SAA located on a concrete floor with no visible cracks

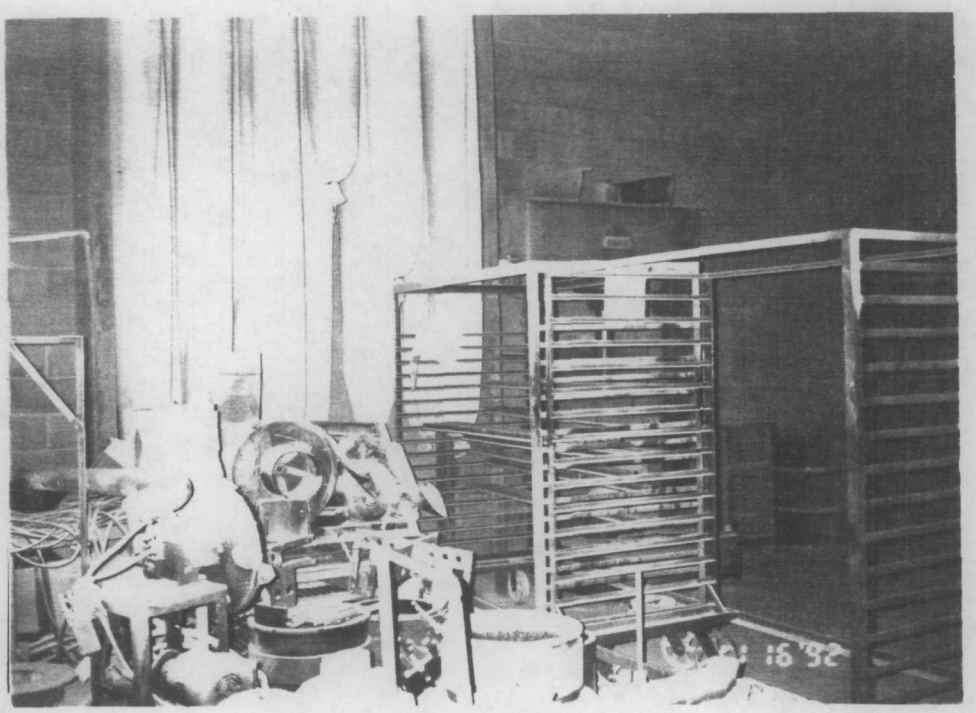
Photograph No. 7
Orientation: West
Description: Waste Oil CSA located on a concrete floor with no visible cracks

Location: SWMU 6
Date: 10/28/92



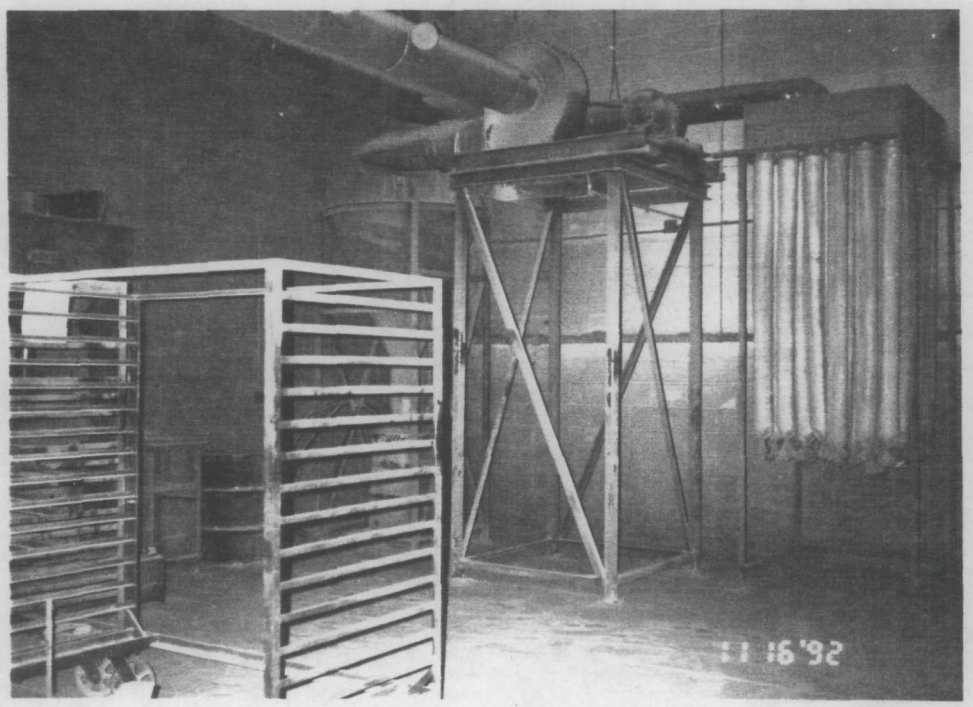
Photograph No. 8
Orientation: North
Description: Sawdust Baghouse Dust Collector located on a concrete pad

Location: SWMU 7
Date: 11/17/92



Photograph No. 9
Orientation: West
Description: Bags for the Grinder Baghouse Dust Collector

Location: SWMU 8
Date: 11/16/92



Photograph No. 10
Orientation: North
Description: Bags and Grinder Baghouse Dust Collector located in the corner

Location: SWMU 8
Date: 11/16/92

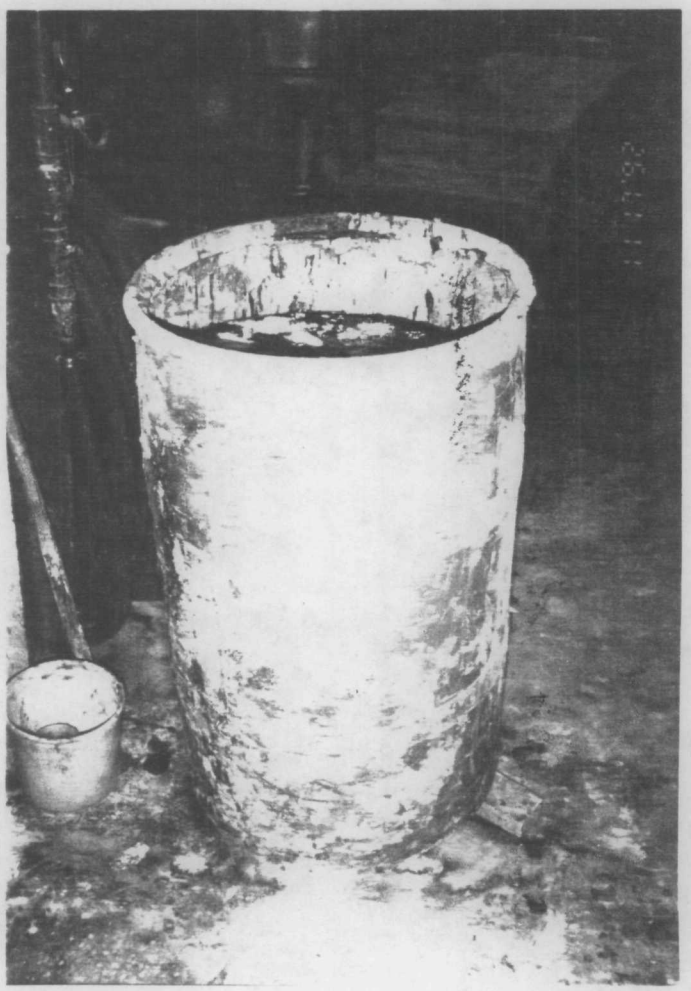
Photograph No. 11
Orientation: North
Description: Ovens

Location: SWMU 9
Date: 11/16/92

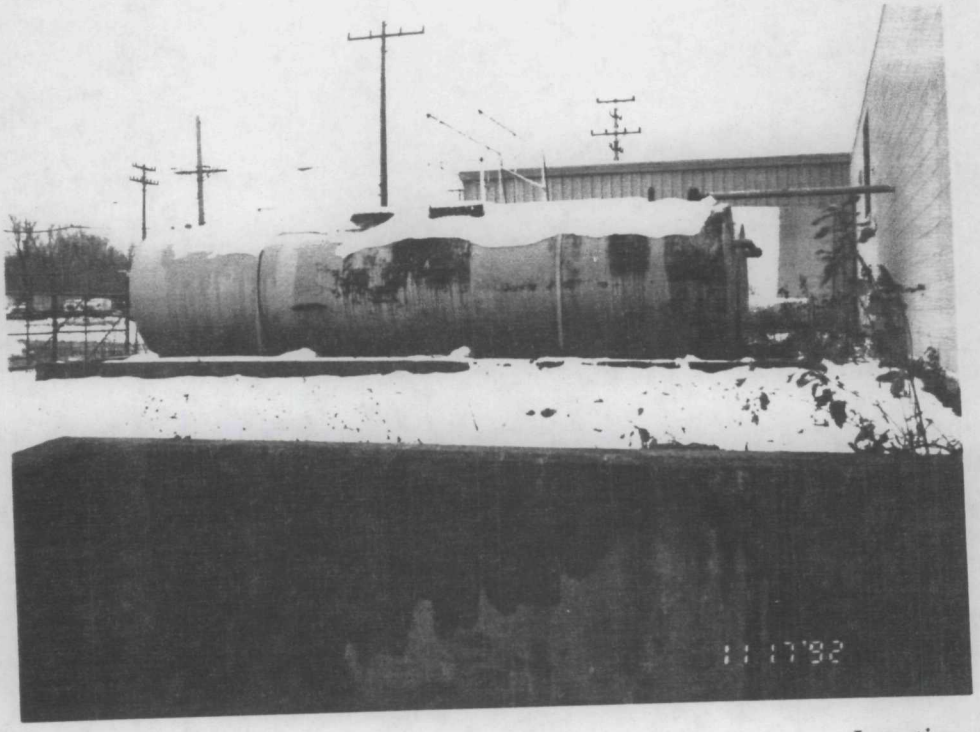
Photograph No. 12
Orientation: Northwest
Description: Dilution Tank

Location: SWMU 10
Date: 11/16/92

Photograph No. 13
Orientation: North
Location: SWMU 11
Date: 11/17/92
Description: CSA No. 3 located on a concrete floor containing one 55-gallon drum of nonhazardous diatomaceous earth waste with about 30 empty 55-gallon drums in the background



Photograph No. 14
Location: SWMU 12
Orientation: Northwest
Date: 11/17/92
Description: Diatomaceous Earth SAA



Photograph No. 15
Orientation: South
Description: Waste Oil ASTs

Location: SWMU 13
Date: 11/17/92

Photograph No. 16
Orientation: South
Description: Underground Waste Oil Trap

Location: SWMU 14
Date: 11/17/92

Photograph No. 17
Orientation: Southeast
Description: Underground Waste Oil Trap

Location: SWMU 14
Date: 11/17/92

Photograph No. 18
Orientation: Northeast
Description: Styrene ASTs

Location: AOC 1
Date: 11/17/92

Photograph No. 19 Location: AOC 2
Orientation: Northeast Date: 11/17/92
Description: Five 2,500-Gallon Paint ASTs lying on their sides

Photograph No. 20 Location: AOC 3
Orientation: East Date: 11/17/92
Description: The location of two 1,000-gallon Solvent USTs

ATTACHMENT B
VISUAL SITE INSPECTION FIELD NOTES

10/28/92 Zehrco Plastics

PRC on site 10:45 am

Ted Hebert Environ + Safety Compliance Consulting

Jack Pleyler Mfg. Mgr.

4/6/84 transferred from RI to William Metters

RI purchased from Molded Fiberglass

(1989) Per Mr. Hebert Act. Not was for address correction

Wastes generated

60% ~~MEK~~ CTM → Methylene Chloride

20% Acetone

20% Toluene

to Chem Solvents, Inc

(2)

Molded Fiberglass Co owns portion of facility that was identified under EPA ID#
3 plants are identified on Part A diagram/site sketch
~~Or~~ "Plant 2" is located approx 1/4 mile east of Plant 1 & 3
Plant 1 & 3 are connected
it appears all TSD activities occurred at Plant 1 & 3
Zehco Plastics (Plant 2)
- molded fiberglass product for client specs - over 1,000 ~~#~~ Ltrs products
- assembly & painting also done at Zehco
45 employees - 3 shifts
automatic security/sensors
security guards on weekends

(3)

property fenced - 6' chainlink

145,350
79,050
224,400 Total sq feet of Plant 2

property L shape

S - residential
E - jr high West Ave Jr High
N - undeveloped land
W - Iten Ind. molded plastic Co. (Mfg fac located on SE corner)

Cleaning paint lines
molding lines
- molding material purchased & manufactured - according to customer specs.

(4)

Waste gen.

Haz. solvent mixture F002, F003 F005, D001
149-55 gal drums / year

non haz: oils ≃ 15-55 gal / year
machine maintenance

No Releases - per consultant
+ Zehrco Consultant

2 SAAs 1984 (Lm 87) - Present
1 CSA 1984 (Lm 87) -
oil storage 1984 - Present

Photo 1 SAA W side of Paint Booth (E)
Photo 2 SAA Paint Mix ROOM (W)
Photo 3 SAA E side of Paint Booth (W)
Photo 4 CSA (S)
Photo 5 Oil storage 3 drum 55 gal (W)

PRC offsite 100 pm

(1) 11/16/92 Zehrco/Blanchard Addams

Sandy A PRC
Lorraine Morris PRC
George B. A.

Blanchard A&B
- manufacture Grinding wheels
- lease bldg from Mr. Morrison

granular aluminum oxide
to landfill
Dust collector/Baghouse

- 5 yrs 4 yrs at facility
- 14 employees
- 2-12 hr shifts
≈ 45,000 sq. feet

Photo 1 Baghouse } loc. in NW corner of B.A area
Photo 2 Baghouse }

(2)

aluminum oxide
grit + clay - compressed to make grinding wheels
Baghouse - 1989 - present

- Broco 80 - cleaning wipers
(grinding wheels - industrial use - machine part)

Photo 3 treatment Tank - for Broco 80 (corrosive) - Cleaner used for cleaning wipers
1 Tm ~~dust~~ discharged to POTW
1 cup to ≈ 250 cups for dilution for use

(3)

- Stoddards Solvent ?
  used in parts cleaner
  5 gallons purchased in 1992 - still ≥3 gal.

- Phenol Resin
  used as an adhesive in wheels

- waste phenol burned in 2 ovens permitted by

- ovens used approx ~~6 day~~ TTM
  2 x week
  ≈ 15 gal/week waste
- burned in oven before disposal in landfill

(4)

Don Tischer
Owner/Finance

(Resin)
Duite - Phenolic Resin Powder by Borden 502/449-6201

Powder + Liquid (AL-5395)

0204010320 - P004 (air permit # LTM)
~~BA~~

PRC offsite 6:00 pm

(2)

[illegible] - Delta [illegible]
showed PR [illegible]
PR [illegible]

Total Warehouse
+
Distribution
Keith Fusco

130,000 sqft
≈11 acres

Photo 1 outside NW corner Bldg
Photo 2 NW outside along RR tracks
Photo 3 5 of unused ASTs on property N of Warehouse (unsure if this area was

(3)

previously Rockwell Int'l property)

Photo 4 RR tank cars
Glycols

Creative Millwork

67,000 sq. feet

wooden window + door grills
occas. a little painting
water base paint
no waste - used until gone
mineral spirits used to clean equip - very small amt used no waste

(4)

Per Mr. Estock
USTs on N side of Bldg
44 employees
2 shifts

Byp. 1 - sawdust sold for filler
American Wood Fibers,
Jessup, MD

manufacture
Aluminum sulfate
for water treatment

Lime added to filter material

CSA ≃ 40' X 12'

Delta

1-2 weeks
1 55 gal. Diatomaceous earth - used as filter

(1) 3)

Monday 11/16/92

4:30pm ZERCO PLASTICS

AT ~~BLANCHARD ABRASIVES~~ RD
Blanchard Abrasives

In this building manufacture grinding wheels.
Property leased from Mr. Morrisons
Wastes produced: alum. oxide (granular) - landfilled
Make wheels
Have a baghouse - to landfill w/ dust

This building leased 4 yrs next month (9/89)

ALL 11/16/92

(2)

11/16/92

14 employees
2 12-hour shifts
~45,000 sq. feet

Photos 1+2 Baghouse
(adjacent to
Creative Millwork
+ opposite loading
docks)

Wheels made of
frits + Clay

→ Baghouse since
in building

Broco 80 used
for cleaning
mixers

11/16/92 (3)

After mixers are
cleaned Broco 80
solution goes to
sewers

Wheels used for
machine parts
industrial.

Parts washer Ale
bought ~~1/2~~ 5 gallon
+ been here ever
since, Maint area
man Uses

→ Concrete, used Broco 80
is diluted w/ more
water + down the
sewer Photo 3

(1)

11/16/92

No floor drains in area.

Parts washer w/ about ½ gal in it, split steel drum- lavent dumped any. Stoddard solvent

Ovens used to burn Resin waste Photo 4 Some DEPA person measured. Only 2 work.

OA 11/16/92

(5)

11/16/92

Resin used as binder in 1% of product Ovens fired 1 or 2 times a week but depends on productivity Oven temp 360°

Other 99% is vitrified

Burn about 15 gal w/ each oven firing but mixed w/ a lot of other stuff

OA 11/16/92

(6) 11/16/92

Most of equip
from Boston plant
or at least ovens
are from Boston
facility & built
in 1950's

Someone from city
took sample of
Broco 80 soln
in tank and said
OK but George
hasn't gotten
paperwork yet.

~~Ovens are~~

6:20 pm PRC off-site

ADR 11/16/92

(7) ~~11/16/92~~

Tuesday, November 17, 1992

8:45 GE Corneaut
Carl Heinonen
Ed Klimpel
Tom Harlon (Corp)
Lorraine Morris
Sandy Anagnostopoulos
Intro meeting

First part of plant
built in 1941
Undeveloped prior
to 1941.
~ 13 acres
last edition plastics
area in 1971
~ 160,000 sq. ft

ADR 11/17/92

(8) 11/17/92 IUE

125 employees
3 shifts - 5 days/wk
- lamp bases & components also a few parts for flash cubes

some metal parts and ceramic section in lamp bases

receive metal coils use presses to form parts, clean and thread for bases put glass and put brass eyelet

aa 11/17/92

(9) 11/17/92 IUE

Melt the glass which is received in chip form and placed in base and formed.

Wastes
Perchloric sludge (F001)
agitene - to degrease
~~Brush~~
degreasing

Working on a new system to eliminate

In 1992 generated 1½ drums sludge

Paint & solvent waste from Bright stick operation

11/17/92 TUE (11)

Oil picked up
60 days ~ 100 drums
Chem Waste
from stamping
operation

Replaced
Dip line (nitric)
for after base
went thru fires
1949 – 1985
used to neutralize
w/ lime & send
sludge to landfills
and delisted
Was disassembled
& replaced with

~40 yd³/week

11/17/92 TUE (10)

Not even a drum
of paint waste
Working on
eliminating this

Shipped out are
D001 Solvents are
xylene and MEK

From Burnishing
system soak base
3% citric acid
and mechanically
remove oxides on
bases from ∅ glass
process

to Flow process plant

Forms a sludge
1 - 1½ drums w/
Chrome in it

(12) 11/17/92 TUE

6-7 yd^3 of H_2O soluble oils

H_2O soluble oils go to waste water treatment system along w/ solution, citric acid, from Burnishing process

Scrap aluminum goes back to vendor

Perchloric sludge from degreasing pins now spin instead.

ea 11/17/92

11/17/92 TUE (13)

Closure on area 5'x15'

Now a different area for containers storage

H.W & oils together

~~EA~~

Now W.W. treatment ~~system~~ ~~as~~ is in same spot, same system used as a batch system now

Some satellite accumulation areas.

ea 11/17/92

ea 11/17/92

(14) 11/17/92 TUE

Small quantity '87
Generator '85

9:35 Tour starts

Photo 6 scrap
Al baled 42-43,000 lb/3wks
? How much/wk

2 ~~Lone~~ oil traps
in this area
used to have
presses here.

P-7 former hzg. waste

P-8 Perchl. sludge
sat accum
'82

(15) 11/17/92 1985 or 1986

Current H.W area
4 full 55 gal
drum of agitene
a coal degreaser
used in shop.

Floor drain goes
to 500 gal fibre
glass tank never
had a spill.

Also have products
in area paint, & solvent

29 gallons of waste oil

all drums grnded
Photo 9. H.W. area
30'x20'

(16) 11/17/92 TUE

Photo 10 staging area where drums are logged in by Carl

Photo 11 sat ac area coal degreaser, used oil + antifreeze, used oil.

3 washers only sat area

w/spinner able to go from 16 drums ☓ sludge to

aa 11/17/92

(17) 11/17/92 TUE

Scrap glass that's not recycled ~ 20 yd^3/wk

P-12 W.W.T area
P-13 sludge
P-14 filter drum

P-15

P-16 Burnishing system 10 or 20 e/yr sludge into back drum about ½ drum now - cleaned last month keep drum till full then dispose

aa 11/17/92

P-17 waste paint solvent sat ac area

No plastic waste from Brite Stike

10:35 Tour Complete
Back in office

Floor drains in press area ~~go to~~ all blocked. '71 ~~addition~~ addition no floor drains.

Air permits for perclo & Brite stick

ac 11/17/92

Lendlife / copy of all flow-chart

Baleing of some type all along

'80-'85 Former H.W. area

Degreaser sat ac. area

~~'81~~ '82

WWT - '57

Waste glass since '41

Burnisher installed '84-'85

Paint waste '84-'85

(20) 11/17/92 TUE

Paint waste began when Brite Stick started '84-'85

One UST in west warehouse used to store heating fuel oil '73-'79 collection sump on outside for fuel spills. 2500 gallon Emptied but not filled don't know if its steel or fibre glass. On list to be pulled

11:20 PRC off-site

2:25 LAWLESS CONTAINER and Delta Chemical Facilities are separated by a chainlink fence. All indoors. Behind facility 2 AGST in ROCK ~~DIK~~ containment structure (ORANGE TANKS)

↑

P-18

P-19 ?

P-20, 21 located near Green AST, CEMENT pit ~ 15' deep

(21) 11-17-92 TUE

- DA 11/17/92

(22) 11/17/92 TUE

P-22 Green ASTs (2) all on EAST end of building

2:40 Total Warehouse and Distribution ~130,000 feet Keith Fusco Geister owner? maybe 11 or 17 acres

P-23 N West end of Geister Building

P-24 → maybe where wastepile was

aa 11/17/92

11/17/92 TUE (23)

P-25 5 storage tanks wooden on sides, N or Geister Building

P-1 Tankard Car on RR track

3:15 Creative Millwork ~67,000 sq. ft. Wood window + door grills

Do some painting (occasionally) but its water reducible

Some mineral spirits used for equipment but it evaporates off

aa 11/17/92

(24) 11/17/92 TUE

USTs filled w/ H_2O
water table high
so Keister thinks
filled to keep
them sunk

44 employees
1 full, 1 partial shift

Paint brought in
5 gal buckets.

Waste ~~sawdust~~ ~~chips~~ sawdust used
for animal bedding,
plastics, & wood flour.
American Woodfibers
out of Jessup, MARY-
LAND ~6 tons (1 trailer)
per week

11/17/92

11/17/92 TUE (25)

use a Biodegradable
solution to dissolve
pine pitch on tools

P.2 location of USTs

4:10 Delta Chemicals

1 1/2 drum / 1-2 weeks
pH ~ 5 add lime

Make $AlSO_4$? (sulfate)

Company comes 1 wk
and removes drums

All sewers capped
off no water to

(26) 11/17/92 TUE

sewers all H_2O used in Product

Here since 1987 (DEC)

P-3 Diatomaceous earth (filter materials) drum sat acc area

P-4 Storage of 1 drum just had ~~to~~ shipment go off site

P-5 Creative Mill Bag House

OA 11/17/92

11/17/92 TUE (27)

P-6 2 Buildings possibly owned by Slater. Possible previous tanker truck cleaning operations (inside of tankers)

4:30 PRC off-site

OA 11/17/92